# Water Resources Management Plan 2024

# Statement of Response

## Annex 3: Our responses to feedback from members of the public

May 2025


from Southern Water

# Contents



## List of Tables

# Glossary

| Acronym | Term | Definition |
|---|---|---|
| **AMP** | Asset Management Plan | Water company business plan over a 5-year period. |
| **AMR** | Automatic Meter Reading | Type of water meter that can be read remotely using drive-by technology. |
| **ASR** | Aquifer storage and recovery | A way of increasing the amount of water available by increasing the recharge of groundwater storage during wet periods so the water can be used sustainably in drier periods. |
| **BVP** | Best Value Plan | A Water Resources Management Plan which as part of its development considers a range of factors (alongside economic cost) with the aim of increasing the overall benefit to customers, the wider environment and overall society. |
| | Catchment | The area from which precipitation (rainfall) and groundwater would naturally collect and contribute to the flow of a river. |
| | Central area | Supply area comprising the Sussex North, Sussex Brighton and Sussex Worthing water resource zones. |
| **CMA** | Competition and Markets Authority | The CMA can determine a Price Review if a water company requests it. If a company asks for the CMA to determine a Price Review, the CMA determination takes precedence over the Ofwat determination. |
| **Defra** | Department of Environment, Food & Rural Affairs | The Government department responsible for setting both water and environmental policy. |
| **DO** | Deployable Output | The output of a source or bulk supply as constrained by licence (if applicable); pumping plant and / or well / aquifer properties; raw water mains and / or aqueducts; transfer and / or output main; treatment; water quality. |
| | Drought Permit | A statutory authorisation granted by the Environment Agency under drought conditions, which allows for abstraction/impoundment outside the normal conditions/schedule of existing licences on a temporary basis. |
| | Drought Order | A statutory authorisation granted by the Secretary of State during drought to modify abstraction / discharge arrangements, augment, use or to set other requirements on a temporary basis. |
| **dWRMP** | Draft Water Resources Management Plan | |
| **DWI** | Drinking Water Inspectorate | The government's drinking water quality regulator. |
| | Eastern area | Supply area comprising the Kent Thanet, Kent Medway East, Kent Medway West and Sussex Hastings water resource zones. |
| **EA** | Environment Agency | The government's environmental and water resources regulator |
| | Environmental Destination or Environmental Ambition | A strategy developed at a regional level to help enhance the natural environment through reduction to water resources activities and by sustainable abstraction. |
| **ERP** | Emerging Regional Plan | The draft least cost regional plan prepared by Water Resources South East under the National Framework as was consulted upon in January 2022. |
| **fdWRMP** | Final Draft Water Resources Management Plan | |
| **GDPR** | General Data Protection Regulation | |
| **HRA** | Habitat Regulations Assessment | Assessment to consider potential for significant effects (if any) of options and strategies on designated European sites |

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| **HWTWRP** | Hampshire Water Transfer and Water Recycling Project | |
| **MAR** | Managed aquifer recharge | A controlled way of increasing the amount of water in groundwater. |
| **Ml/d** | Mega litres per day | Millions of litres per day. |
| | National Framework | The Environment Agency's national framework for managing future water need for England by the means of regional planning introduced in March 2020. |
| **NE** | Natural England | The government's adviser for the natural environment in England. |
| **Ofwat** | Office of Water Services | The economic regulator of the water sector in England and Wales. |
| | Outage | Temporary loss of Deployable Output. |
| **PCC** | Per Capita Consumption | Average volume of water consumed by person in a household, generally expressed in litres per person per day (l/p/d) or litres per head per day (l/h/d) |
| **PR24** | Price Review 2024 | Price reviews occur every five years and are carried out by our economic regulator Ofwat. These reviews determine how much water companies can charge customers to finance the investment required in the five year period. |
| **PWC** | Portsmouth Water Company | |
| **RAPID** | Regulators' Alliance for Progressing Infrastructure Development | The collaborative regulatory group of Ofwat, the Environment Agency and Drinking Water Inspectorate formed to accelerate development of new water infrastructure and design future regulatory frameworks. |
| **RBVP** | Regional Best Value Plan | The Best Value Plan for the region prepared by Water Resources South East - as consulted on in Autumn 2022. |
| | Source | A named input to a water resource zone where water is abstracted from a well, spring or borehole, or from a river or reservoir. |
| | Section 20 Agreement | The agreement signed by Southern Water and the Environment Agency during the Western Inquiry pursuant to Section 20 Water Resources Act 1991 (March 2018-2030) recognising the need to rely on drought permits and drought orders until long term infrastructure is in place to secure supply in Hampshire. |
| **rdWRMP** | Revised draft water resources management plan | |
| **SEA** | Strategic Environmental Assessment | Assessment to identify and assess any significant environmental effects of the Water Resources Management Plan. |
| **SEMD** | Security and Emergency Measures Directive | |
| **SES** | SES Water | |
| **SESRO** | South East Strategic Reservoir Option | A reservoir proposed for development in South East of England that could benefit customers of Affinity Water, Southern Water and Thames Water |
| **SEW** | South East Water | |
| | Sustainability Reduction | Reductions in Deployable Output required to meet statutory requirements and / or environmental expectation or to reach any regional Environmental Destination |
| **STT** | Severn Trent to Thames Transfer | |
| **SWS** | Southern Water Services | The registered name for Southern Water |
| **T2ST** | Thames to Southern Transfer | An SRO enabling water from the South East Strategic Reservoir (a reservoir SRO) and/or the Severn to Thames Transfer (a transfer SRO) in Thames Water's |

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| | | Swindon and Oxfordshire water resource zone to be transferred to Southern Water's Western area, being progressed as a collaboration between Southern Water and Thames Water. |
| **TUB** | Temporary Use Ban | A drought restriction imposed by water companies on customers. Restrictions include not using water supply for leisure pursuits such as watering a 'garden' using a hosepipe, filling a pool, washing a car, among others. |
| **TWUL** | Thames Water Utilities Ltd | The registered name for Thames Water. |
| **UKCP18** | United Kingdom Climate projections 2018 | |
| | Western area | Supply area comprising the Isle of Wight, Hampshire Andover, Hampshire Kingsclere, Hampshire Rural, Hampshire Southampton East, Hampshire Southampton West and Hampshire Winchester water resource zones. |
| | Western area Inquiry | A public inquiry into proposed changes to Lower Itchen, Test and Candover abstraction licences in Hampshire, held in March 2018. |
| **WFD** | Water Framework Directive | European Union Environmental Legislation (transposed and retained into English law) committing to achieving good quality and good quantitative status of all water bodies. |
| **WINEP** | Water Industry National Environment Programme | A list of environment improvement schemes that ensure water companies meet European and national targets related to water. |
| **WRMP** | Water Resources Management Plan | Statutory plan produced by water companies every five years to plan to meet supplies over a minimum 25 year period. |
| **WRP** | Water recycling plant | A plant using advanced treatment techniques to convert treated wastewater into highly purified source water. Special membranes are used to remove salts and a range of other impurities. |
| **WRPG** | Water Resources Planning Guideline | The Water Resources Planning Guideline prepared by the Environment Agency, Ofwat and Natural Resources Wales. |
| **WRSE** | Water Resources South East | Partnership of water companies and regulators in South East England working together to make best use of available water resources. |
| **WRZ** | Water Resource Zone | The largest possible zone in which all resources, including external transfers, can be shared and hence the zones in which all customers experience the same risk of supply failure from a resource shortfall. |
| **WSW** | Water Supply Works | |
| **WTW** | Wastewater Treatment Works | |

# 1 Introduction

We consulted on our revised draft Water Resources Management Plan 2024 (rdWRMP24) from 11 September 2024 to 4 December 2024. The consultation resulted in over 1100 representations. In order to respond to the feedback, we have divided it into the following categories and produced a separate document for each category as follows.

1. Feedback submitted via online questionnaire and as a result of a group action - Annex 2
2. Feedback from members of the public - Annex 3
3. Feedback from our regulators and other organisations - Annex 4

This annex covers feedback from members of the public and our responses.

# 2 Analysis of feedback

The feedback from members of the public and our responses are given in Table 1. We have reproduced all the comments from the general public into this document as received without correcting any spelling mistakes and/or grammatical errors in the original feedback. The only changes we have made are to:

- redact names and removing any personally identifiable information where necessary in order to comply with General Data Protection Regulation (GDPR).
- Redact site names that could potentially be non-compliant with the Security and Emergency Measures Direction (SEMD) and
- Redact material that could be commercially confidential.

In order to be open and transparent we have published almost all the fdWRMP24 documents on our website. The small number of restricted documents will be available to view in person via appointment at our head office.

## Table 1: Feedback on our rdWRMP24 and our responses.

| Reference | Feedback | Southern Water Response |
|---|---|---|
| WRMP01 | Thank you for this email. But I don't understand the need for the consultation. The solution is easy:<br>1. Spend more money on maintenence, clearing waterways, drains etc.<br>2. Stop blaming climate change as its being used as an excuse not to spend time and effort on doing these things.<br>3. Stop making record profits and invest in the job in hand. This should not be profit driven.<br>4. Stop Greed<br><br>SIMPLE. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1: We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>2: Climate change is pivotal to much of the work we are doing. As stated in the Government's policy paper Water abstraction plan: Environment - GOV.UK "*A changing climate is likely to bring greater variability in rainfall and higher temperatures. We expect less groundwater recharge and larger seasonal variations in river flow as well as changes to when and how extended dry periods occur. Sustainably abstracted water bodies will be more resilient to changes in climate and drought pressures so addressing unsustainable abstraction will help improve resilience to climate change*."<br><br>3 and 4: Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP02 | Once again no quantification of benefits or costs.<br>PR exercise only? | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. |
| WRMP04 | Here are my comments on the Southern Water revised draft Water Resources Management Plan. I live in Emsworth, Hampshire and am a customer of Portsmouth Water (supply) and Southern Water (sewage). I live close to where Havant Thicket reservoir is being built.<br>I support building more reservoirs, as they have a long life, are fairly cheap to run, and offer the possibility of leisure facilities for swimming, walking, fishing, and habitats. In other countries (Germany and Austria) the public have a right to access lakes for leisure. Given the popularity | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the |

| Reference | Feedback | Southern Water Response |
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| | of wild swimming and our need to improve mental and physical health, providing more options like this is a significant benefit.<br>I also support moving river abstraction points downstream to the tidal/freshwater boundary so that water companies can take more water without damaging the upstream river. This takes advantage of the fact that modern technology can clean water from further downstream than could the Victorians - who obviously wanted water from as far upstream as possible. This is being explored by Portsmouth Water, but apparently not by Southern Water. It not only allows more abstraction but does so while increasing flow in the river upstream and thus improving river health. We should be taking advantage of modern technology like this.<br>These are cheaper more sustainable and resilient solutions than desalination and wastewater recycling.<br>I therefore object to wastewater recycling and desalination, not in principle, but until the above measures have been taken. Both are energy intensive and have environmental effects (the concentrated effluent/brine that they produce has to be released into the environment). We should not be pursuing energy-intensive processes where lower energy alternatives are possible. If used they should only run on renewable energy. Wastewater recycling plants also have a life of at most 60 years. Reservoirs can last forever.<br>Havant Thicket Reservoir<br>I absolutely object to recycled water being added to Havant Thicket Reservoir. Havant Thicket reservoir was intended and planned to be the first and only reservoir in the world fed by chalk streams which receive no sewage overflow or effluent. As such it would offer a unique habitat. Recycled wastewater will have a different chemistry and so should not be added. It also cannot be guaranteed to be clear of all contaminants (and in fact one point of the reservoir being used would be to act as a buffer in case of a treatment problem).<br>Also the reservoir as originally planned (filling in the winter and supplying in the summer) would have reduced nitrate levels in Chichester Harbour - helping with the eutrophication problem we have and giving a benefit to local people. The change of use to recycled water, filling and supplying simultaneously all the time, means that the nitrate reduction will not happen. So one of the key local benefits is lost.<br>I am also unhappy that it would be used as an environmental buffer. We do not want that reservoir used as a buffer in case of treatment problems.<br>The reservoir is also a long way from where the water is needed (Southampton) meaning they need to pump the water a long way, and they need to pump 365 days a year 24/7 to keep the pipeline sweet. This is heavy energy use. If Southern Water want to store recycled water, to which I do not object in principle, they should build a reservoir close to where the water is needed. | tidal limit of the River Itchen. This is not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Desalination is an energy intensive process. However, the drawbacks of any option have to be considered in view of the benefits it delivers. We have excluded desalination options in cases where drawbacks outweigh benefits or where the environmental challenges cannot be satisfactorily overcome.<br><br>The potential environmental impacts associated with desalination plants were a key reason for the desalination option in Southampton to be replaced. However, some of the environmental impacts are location dependent, there are cases where these impacts can be mitigated to acceptable levels. We have submitted a research proposal to the Ofwat Innovation fund to investigate ways to reduce the environmental impacts of desalination plants.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

| Reference | Feedback | Southern Water Response |
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| WRMP05 | Completed feedback form along with comment in Q10 "Focus on leak reduction and repair. V important for public perception" | Thank you for responding to Southern Water's Water Resource Management Plan consultation held between 11th September and 4th December 2024 and completing the feedback form. |
| WRMP06 | With respect to your plan to transfer recycled sewage water from [redacted] to the Havant Thicket Reservoir, this is objected to by many residents. Recent performance by water companies does not give residents confidence in the planned process especially as there have been recent incidences of e-coli in other water supplies. I am not sure what damage would be done to the reservoir water if there was an operational problem with the recycling. Have Southern Water with Portsmouth Water actually explored other approaches which would be more acceptable to residents.<br><br>Increase extraction from the Havant springs. In 2008 the extraction license from Havant springs for Portsmouth Water was reduced by 16% by the Environment Agency. Hence the volume of extraction can be increased today by 16%. In fact the Lavant stream to the West of Langstone is at least 40cms higher all year round compared to 20 years ago. I appreciate that the local rivers need a minimum level of flow but in my 40 plus years living in Havant there has always be a steady flow. In fact the rain on the downs takes months to flow through the chalk to reach the springs and hence March rains arrive in the summer dry spells.<br><br>Once the reservoir is full, spring water can be extracted to the maximum extent to supply customers, the reservoir is only needed when there is a shortage of spring water. The flow in the rivers/streams can be maintained close to the minimum flow level or replenished by recycled water. Portsmouth Water measure the various river/stream flows and must know how often over the last 30 years a minimum river flow level has been reached and be able to calculate the extra volume of water available if extraction is maximised.<br><br>Replenish rivers with recycled water. If the recycled water planned to be pumped to the Havant Thicket reservoir is of a quality good enough for sourcing human use then it must be of a quality to discharge into the harbour. As mentioned above spring water can be extracted to the maximum extent North of [redacted] and then replenished slightly downstream with recycled water from [redacted]. Net affect on river/stream flow could be zero. In fact one pumping station could manage the extraction and replenishment. The Hermitage stream and other streams are underground or in concrete channels in many areas of Havant so clearly not an environment problem if there is a replenishment of water flows in these areas.<br><br>Additional Water Sources. My understanding is that Portsmouth Water do not extract from all available springs. Is the Homewell spring used? Have Portsmouth Water ensured all available spring sources are being used. Are we maximising the use of all spring water sources.<br>The water table in Havant is very high all year. This has been stated to me by the Environment Agency. Have you investigated the use of water bore holes. A few bore holes could increase the supply of water to the reservoir or into the main supply. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding Homewell springs and springs across Havant and Bedhampton in general, they vary in size, some produce millions of litres a day, others just a steady trickle in high groundwater periods. However, for information, Homewell sits within the remit of Portsmouth Water and is not used for public water supply – it is relatively small with regards to flow, and the spring flows into a pond that is managed by Portsmouth Water for biodiversity purposes.<br><br>Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The Hampshire Water Transfer and Water Recycling Project (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>A key benefit of Havant Thicket reservoir is the ability to store recycled water ahead of and during a drought.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. That is, available water is based on forecasts, not on historically observed values. This requirement is set by the government, not by water companies. |

| Reference | Feedback | Southern Water Response |
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| | Could there be better solutions than that currently planned. I would be interested in understanding what additional spring water volume could be extracted from current sources and from potential new sources, and whether this could remove the need for the use of recycled water in the water supply. Could the recycled water be used to replenish the extracted water in the rivers/streams. | |
| WRMP07 | Not related specifically to the publication of WRMP. A protocol statement that GARD intends to claim judicial review against Secretary of State for the reservoir in Abingdon. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We recognise that GARD has expressed opposition to the reservoir and has indicated its intention to challenge the decision by way of judicial review against the Secretary of State. However, this consultation is focussed on Southern Water's WRMP which looks at a range of options for ensuring a secure and sustainable water supply for the future.<br>We welcome all feedback on these options including any thoughts you may have on alternative solutions or potential impacts of different proposals. If you would like more information on the judicial review or GARD's position we recommend checking official sources such as the relevant governments departments or GARD's own communications. |
| WRMP08 | I've been following this company's attempt to persuade users and residents of Rowlands Castle where I live that filling the Havant Thicket reservoir with treated effluent is the best and only idea to stave off an anticipated drought.<br>Firstly, when I receive updates it seems to suggest dates for the "plant" for reverse osmosis are being put back, as if it is a forgone conclusion. They should stop this as it's misleading.<br>The plant that they wish to create is not very good for the environment in that it consumes a lot of energy and needs to run all day every day even though it apparently is only for use to supplement the reservoir levels in times of drought. Plus the chemicals employed in the process are not good for the environment. And at the end of the process the "waste" that isn't the cleaned effluent will be pumped out into the Solent - again this will be very bad for the environment and using the sea as a dumping ground for waste has been proven to be bad for the planet. No research has been undertaken into the effects of concentrated effluent being discharged into the sea just a small distance from our coast. If the cleaned water is sent to the reservoir it then has to be pumped many miles to Southampton - energy hungry and if it's needed there why not build a plant there?<br>I suspect that the only reason SW want to build the plant is because of the tax breaks they'll get for capital investment whilst fixing existing pipework and sewage works is a revenue cost and not as effective for dividends and management bonuses.<br>I'm very happy to pay more for my water as it is rather essential for life. And I don't want my grandchildren to inherit a planet that has been destroyed merely for profit. The water company owners are not altruists but are run for profit. This isn't incompatible but this consumer doesn't want to fill investor pockets whilst harming the environment and still leaving me with an expensive utility company that I can't change. My extra spend should go direct to the supply of clean water and not into management pockets.<br>My fear is that in a few years time we will have another blood products, Teflon, post office, PPI, various drugs (eg thalidomide) question when we have the chance to prevent the inevitable from happening. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household |

| Reference | Feedback | Southern Water Response |
|---|---|---|
| | By all means consider fixing the leaking pipework system but don't pretend that a reduction of 50% by 2050 is a goal that should be admired. Make it 75% by 2030! And build more reservoirs. I appreciate that's not easy but just because it's difficult shouldn't mean it should be sent to the bottom of the list.<br>With climate change we are more than likely to see considerably more rain in the future than we've been accustomed to. On the tv news a SW person stated that of the giga litres of rain that fall freely from the skies only a very small percentage (I recall 1% but could be mistaken) is captured. Separate grey from waste water so that less needs to be processed and thus there are fewer spillages into the water courses. Capture rainfall from our roofs for use in toilets and for household tasks that don't need drinking water quality. Fix leaking pipes! Create new canals to transport water from Wales and Scotland?<br>Basically employ more thought than just fixing on an expensive and unnecessary process to clean effluent that is suitable for use in arid places like California or the Middle East not wet Britain. | and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level. |
| WRMP09 | Dear Defra and Southern Water,<br><br>I note that Annex 12 and 13 are missing from the Technical Report download link.<br><br>May I therefore ask please for such link or pdf copies of these sections in order that I may have all the prescribed 'consultation' material disclosure to enable me to 'have my say'.<br><br>Error is unlikely. So, if these sections are in fact under some form of publication readership restriction (for whatever reason, and however access is being limited), then essentially the requisite full disclosure obligation has been compromised and an explanation is warranted. Other Annex sections refer the reader to these missing sections.<br><br>Thank you in anticipation. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable, we produced a non-technical summary document for those seeking a high-level understanding of our plan. You can view the publicly available documents on the link below:<br>https://waterresources.southernwater.co.uk/find-out-more/ |
| WRMP10 | I reside in Hayling Island (Havant), and am a customer of both Portsmouth Water and Southern Water. I would like to voice my concerns about the future planned activities of Southern Water.<br><br>There is significant opposition to Southern Water's proposed use of the HTR given that Portsmouth Water's customers will then also receive the mixed water, and the Local Planning Authority consent for construction and operation is conditional on the reservoir being filled with 'raw water' sourced from the company's local chalk-fed freshwater springs. Permission was not | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can |

| Reference | Feedback | Southern Water Response |
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| | granted for treated effluent to go into the reservoir. In view of Southern Water's dismal record of disposing of effluent, I would no longer feel able to drink the water from the reservoir. Surely this would add to the mountain of plastic water bottles bought and then disposed of.<br><br>I am also concerned about the significant impact associated with the concentrated reject water discharge into the Solent. Southern Water do not have a good reputation for large and regular discharges into Langstone and Chichester Harbours. I believe that no independent monitoring of the discharge into the reservoir is planned. This is beyond belief.<br><br>It would also cause the loss of a biodiversity opportunity to create a chalk spring fed reservoir.<br><br>This is a very expensive solution, at least £1.2 billion, with costs spiralling, making it hard to believe that it will provide best value for customers. | provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A further consultation on water quality was held in 2025. This will include details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP11 | I am both a Portsmouth Water and Southern Water Customer.<br>The latest Southern Water draft Water Resource Management Plan (WRMP) contains proposals that will affect all Portsmouth Water and Southern Water drinking water supply customers across Hampshire, the Isle of Wight and West Sussex. Alternatives such as new reservoirs and improved local water recycling, and moving abstraction points along rivers achieve the required goals for far less cost, are more environmentally sound and doesn't contaminate the springwater-fed Havant Thicket Reservoir.<br>The volume of documentation presented with the consultation is immense, even so, some key documentation is withheld from public view, including the Options Appraisal document which should have addressed all environmentally sound and sustainable options, justifying the Company's preferred solution for future water supply, predominantly the high-tech recycling of effluent from a number of existing wastewater treatment plants - including Sandown (IoW), Littlehampton ([redacted]) and Havant ([redacted]) - using new controversial reverse-osmosis sewage filtering plant. Southern Water's previous strategic option, reverse osmosis desalination, at Ashlett Creek, near [redacted] (in 2021) was thrown out by public objections and the Environment Agency's guidance which recognised that it could not pass a Habitats Regulations Assessment.<br>The new WRMP has further options in it, such as shipping-in water from Norway by tanker during a drought situation. This is hardly environmentally sound and will need even more specialist plant and pipework to be built, as well as lots of chemicals to treat the tanked-in water as it is highly acidic, before it can be mixed with ours. All this adds environmental risk and contamination exposure to our own supply and eco-system. This is clearly not feasible or acceptable. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with |

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| | Nothing in Southern Water's proposals mentions fixing the ailing pipework infrastructure. This would also go a huge way towards saving water. We have just had the wettest 12 months in England since 1836. This is water that should be saved, hence reservoirs. We don't need the sewage recycling plants, cross-county pipework and the associated increased environmental impacts and risks.<br>Instead of reconsidering options based on the evolution of climate change rainfall predictions, the Company has not used the delay incurred by the scrapping of the desalination option. No lessons have been learned and the latest iteration of the WRMP continues the proposed use of the same reverse osmosis approach on a different source - effluent recycling. This is a single high risk energy-intensive high-tech option rather than spreading the future water supply over a broader set of more sustainable, environmentally-sound and lower cost options, presumably considered commercially unattractive given the current water industry funding model. Once built, the proposed plant has about a 30 year life expectancy and has to be run all day every day, consuming electricity and chemicals. A reservoir will still be fine in 100+ years.<br><br>Thank you for reading this. Please consider and promote more sustainable options. | SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable, we produced a non-technical summary document for those seeking a high-level understanding of our plan. You can view the publicly available documents on the link below:<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the comments relating to sea tankering, we are no longer including this option in our plan.<br><br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. |
| WRMP12 | Have you forgotten the Well at Harbour Farm, Bembridge? When this Well's use was discontinued, it was said that the quality of water was excellent and the quantities considerable.<br><br>The pipe work exists to get the supply to the Sandown works, so it could be time to resurrect this supply source. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The source adjacent to Medway Estuary is located in the wetland associated with the mouth of the Eastern Yar, an area with multiple environmental designations, including SSSI, SPA and RAMSAR. As the Well has been out of commission for a lengthy period of time, we do not anticipate that the existing borehole would be useable and a re-drill would be required before abstraction could be restarted. This would be followed by pump tests and water quality sampling to confirm the viability of the water source. We believe the relevant regulatory permissions needed to achieve this would now be unlikely, given its location in such a sensitive environmental area. In addition, the trunk main needed to transport the water is currently decommissioned and if the site were to be brought back online, the PVC trunk main would likely need replacing due to age (and the predisposition of PVC to split/shatter with age). This work would present significant difficulty in proceeding due to the SSSI/SPA/Ramsar site. Although we believe this would be a very challenging site to recommission, we do regularly review decommissioned sites. |

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| WRMP13 | In regards to your wish to mix treated effluent water with spring water in the new reservoir at Havant thicket, I wish to make it known that I WHOLLY AND ENTIRELY DISAPPROVE OF THIS PLAN.<br><br>Southern Water have a blatant and flagrant disregard for the impact of their day to day operations on the community, they have been proven being any doubt to be incapable of carrying out their duties as a caretaker for our vital public services.<br><br>They have caused, and continue to cause huge environmental damage to the community and waters around Hayling Island with their dumping of untreated effluents into the local harbours, affecting all the local wildlife and impacting the community as a whole.<br><br>They have proven to be wholly unsuitable to discharge their duties in a manner befitting their responsibility, they have neglected their duties to maintain the water supply network correctly, choosing instead to cause the network to fall into disrepair so that their shareholders are allowed to benefit, whilst the community are looked to to make up the enormous financial shortfall caused by their poor business practices.<br><br>This company should be brought to book, and be removed from the position for which they clearly have contempt. It is a national, and international disgrace that their poor practice has been allowed to carry on for this long, they are not fit for duty, and clearly cannot be trusted with our vital resources.<br><br>No more, no longer can I countenance their disgraceful and disgusting behaviour.<br><br>Resident Hayling Island. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |
| WRMP14 | I am writing to object strongly to the recycling of effluent into drinking water. I cannot see any need to do this aside from increasing profits for the private company that runs the water company.<br><br>There is more than enough rainfall here in the South of the UK to maintain the required level of water in a suitable reservoir. The forecast is for rainfall to increase with global warming.<br><br>Please register my strong objection to this proposal | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Factors that are considered during the options appraisal process include cost, volume of water produced, resilience to climate change, the environmental impact etc. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. |

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| | | Regarding rainfall capture, we have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage).<br><br>Your objection to the use of recycled water in Havant Thicket has been noted. |
| WRMP15 | I am very concerned and anxious about drinking recycled water.<br>Southern water has a terrible record with sewage.<br>Also with spending money effectively and rewarding poor performance with bonuses.<br>The environmental impact of this Reservoir is huge and unprecedented and not researched or consultrd correctly<br>Please stop this now | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential |

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| | | mitigations. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. |
| WRMP16 | Dear DEFRA<br>I would like to lodge my objections to the Southern Water proposals to use recycled sewage water as a way of topping up the Havant thicket reservoir. My objections are as follows:<br>1. The recycling plant would be built on reclaimed land which is liable to be unstable and likely to release pollutants as it will be built on an old waste dump.<br>2. The 40 km pipeline will consume a lot of energy in construction and over its lifetime. This long distance movement is not necessary with more local solutions.<br>3. Climate change means we have a lot of winter rainfall which could be captured and used during the rest of the year. This would be possible with better use of boreholes, underground storage and even more reservoirs.<br>4. Southern water should follow up on their vague plans to have water abstraction closer to the title limits of rivers in the area.<br>5. The effect on Langstone Harbour of the release of the concentrated residue from reverse osmosis has not been adequately researched.<br>6. The £1.2 billion costs of this project do not offer value for money as compared to other solutions.<br>7. The population projections for the area are in all likelihood too high with the fertility rate having fallen again to 1.45 per female in England.<br>These of some of the many reasons why I hope you refuse Southern Water permission for this unnecessary and expensive project. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | | A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>On climate change, climate change is pivotal to much of the work we are doing. As stated in the Government's policy paper Water abstraction plan: Environment - GOV.UK "A changing climate is likely to bring greater variability in rainfall and higher temperatures. We expect less groundwater recharge and larger seasonal variations in river flow as well as changes to when and how extended dry periods occur. Sustainably abstracted water bodies will be more resilient to changes in climate and drought pressures so addressing unsustainable abstraction will help improve resilience to climate change."<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning |

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| | | approach, we will track population growth and switch to the most appropriate supply-demand balance situation. |
| WRMP17 | I strongly object to recycled water being put into the new reservoir.<br>There is sufficient water in the chalk aquifers currently supplying Portsmouth with water to negate any need for recycling waste water, which can be safely discharged after processing into the sea. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. |
| WRMP18 | Dear DEFRA,<br>I am writing to object very strongly to Southern Water's latest water resources management plan. The plan does not support smaller, more natural and more sustainable options and instead seems intent on promoting the giant sewage recycling scheme and pipeline. Please don't allow this highly technical one off proposal to proceed while Southern Water have not fully explored or explained to its customers the implications and risks involved. There are many other smaller projects that should be explored first - while they might not individually be the flashy single solution that Southern Water apparently prefers, they would provide greater diversity and flexibility to respond to both the changing climate and the changing needs of the population and the environment, while creating less irreversible damage from the outset.<br>Climate change modelling suggests we will have wetter winters and drier summers in future. To protect our rivers we should be moving abstractions points so the bottom of the catchments and preparing to collect water during the wet winters and store it for use when needed. Southern Water is instead planning not to change abstraction and to create additional water via a chemical, energy and carbon needy infrastructure which will have to operate all the time despite the stated intention for it to be a drought resource. This will have a larger than necessary environmental impact and just pushes many problems into the future beyond the scope of Southern Water's current profit concerns.<br>Southern Water has not completed a full review of the plan considering all alternative options as “a full re-appraisal exercise was not considered time or cost beneficial” (Annex 20, page 3) - please do not permit this lack of care for the environment and future generations to stand - we need greater sustainability than the current plan has adequately considered.<br>Furthermore, while they plan to pursue the effluent recycling option which will inevitably take time (and which will most probably take longer than is predicted by the plan given that it is new technology) they want to continue with practices (under the Candover drought option) known to be harmful to the local environment and are even asking that these be permitted for longer than the current deadline for them to cease. This can't be allowed to continue and ending their use should be a priority.<br>The plan which Southern Water has put forward seems to be an attempt to rationalise a preferred choice that is being driven by what will be most profitable. Why are predictions of population growth so pessimistic (growth forecasts of population for the period 2025 to 2050 that are even higher than in the last draft plan (page 82), even though the industry regulator | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plants can be built in a modular fashion, i.e., a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms of being able to meet the anticipated demand, resilience to climate change, and delivering Environmental Destination.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment, supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Climate change modelling suggests we will have wetter winters and drier summers in the future.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023), regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise that informed Annex 20, which was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was |

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| | Ofwat has confirmed they can use the much lower Office of National Statistics (ONS-18) population growth, the figures which most closely aligns with the core strategy in the Ofwat guidance (page 118)? It appears that Southern Water are trying to argue that only the enormous effluent recycling plan will be big enough to solve the problems they predict so they should be allowed to build it - possibly because the previous plan was rejected for not being cost effective.<br>Please reject this plan too and send Southern Water a clear message that they must do better. | that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost-beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation, we reviewed at a high level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>It is our desire to avoid the use of drought options and become more drought resilient. We are working on this and making significant investments to reduce our need for the Candover/Test/Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g., the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br>Reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>For dWRMP24, we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwelling occupancy, population in commercial properties, and business counts. Following the publication of the latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS, and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). |
| WRMP19 | Dear Sir<br><br>Southern Water has submitted a revised water resources plan, which includes the provision of effluent delivery schemes and this is now out for public consultation. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource |

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| | I am writing to strongly object to this latest proposal. I am not an expert in the field and I accept that some of my statements and views may be erroneous. I am aware that my local MP is supportive of my concerns and I have cced him into this email.<br>All the issues are carefully detailed on the Website https://havantmatters.org/<br>Below however are my own views, influenced by a friend who has spent his lifetime working in a senior position in the water industry.<br>Current situation, as understood by local residents<br>Under the current approval for Havant Thicket Reservoir, which I supported, water from a various bore holes and springs at Bedhampton and Havant will be used to supply the reservoir. There is currently a surplus of this water, such that at present, 50% of this spring water naturally flows into the sea, and this will of course be obviated under the current approved plan.<br>The reservoir will hold approximately 8.7 billion litres of water.<br>Southern Water has a water shortage in the Southampton area and over extracts water from rivers Test and Itchen. It sees the Havant Thicket Reservoir as the answer and wants to add recycled sewerage water at this second development stage.<br>The WT&WR Project Proposal<br>Under this proposal, the reservoir will receive recycled effluent 365 days/year. Southern Water proposes a large treatment plant, five pumping stations with three pipelines (including a 45km pipeline to get the water to the treatment works at [redacted]).<br>The new treatment plant will be built on a landfill site at Havant. It will operate using reverse osmosis which is energy intensive. The water will then be piped into the reservoir. I am doubtful that this process will remove all contaminants particularly the noxious polyfluoroalkyl substances and the performance of Southern Water of late, does not fill me with confidence over any assurances that they may give to the contrary.<br>The overall project cost of the second stage is estimated to be £1.2 billion. I would expect this figure to rise and to be a significant additional cost, paid for from Southern Water bills. The extent of possible price rises was recently revealed in draft proposals by the regulator. I do not object to my bills going up, so long as they money is being spent wisely.<br>Outcome - Environmental<br>At the new treatment plant rejected water will be piped into the sea. So, more sewerage flowing into the sea, which is unacceptable now and with a further impact on environment and marine ecology.<br>Pollution and environmental impact caused by the energy needed to operate new treatment plant.<br>Approx 30 million litres will be pumped per day. There will be a huge environmental impact on doing this.<br>Under the current approved project, there is a unique biodiversity opportunity to create a chalk spring water fed reservoir – this will be lost and there will be an adverse impact on biodiversity net gain.<br>Outcome - Financial<br>The project cost of this is enormous and it is not the best way to spend money (see alternatives below).<br>There will be a huge operational cost for operating the new treatment plant plus the pumping costs. | Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. |

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| | Southern Water majority shareholder is Macquarie (Australian investment). Portsmouth Water is owned by Ancala LLP who have a number of ex-Macquarie partners. I think that project is being driven by the search for profit as opposed to finding solutions that are more effective but less profitable. It is not the best use of funds.<br>Outcome - Customers<br>Portsmouth Water customers have a surplus of high-quality natural water. They do not have to accept Southern Water adding recycled sewage into their supply.<br>Solutions<br>These are more sustainable alternatives that give less environment and countryside disruption.<br>Spend the money on the following:-<br>Let Havant Thicket Reservoir fill naturally from the spring water - allow the time to do this.<br>Store water in aquifers or new reservoirs close to Southampton. Aquifer storage is used in the USA and there has been a successful trial in the UK.<br>There are other sewage works closer to the Southampton region, requiring much shorter pipelines, and less use of energy and carbon to get the water to where it is needed<br>Southern Water loses approx. 108 million litres per day through leakage – spend the money fixing this core problem. If leakage halved, then it would be a substantial amount of the water proposed to be supplied by the WT&WR Project. Furthermore, the water mains renewal rate is around 0.5% per year, meaning that a main designed to last 100-120 years is expected to last for about 1000 years. Invest money in mains replacement to further reduce leakage.<br>Develop alternative solutions (‘grey water’) to supply large water users such as golf courses and agriculture.<br>Conclusion<br>The WT&WR Project is unpopular locally, unsustainable, carbon and energy hungry, and a very expensive scheme.<br>I strongly object. | SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill.<br><br>Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal. |
| WRMP20 | To whom it may concern<br><br>In short I strongly object to the proposal by Southern Water to use the Havant Reservoir as part of the Hampshire effluent recycling scheme (using Havant Thicket Reservoir as an environmental buffer).<br><br>DEFRA rejected the previous Southern Water draft WRMP in 2023 following public objections and concerns expressed by regulators. It is very disappointing that the Company has not taken the opportunity to start again, undertake a more realistic review of the water resources position going forward, and a more robust evaluation of potential solutions to bring forward a more sustainable plan.<br><br>This does not provide ‘best value’ for customers or the environment, when more sustainable schemes could be brought forward as part of the plan. The plan provides 'best value' for profit generation and shareholders; with customers (and consumers) and the environmental footprint / impact being secondary. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>DEFRA rejected the previous Southern Water draft WRMP in 2023 following public objections and concerns expressed by regulators. Southern Water has since revised its proposal, and using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | As a local resident and customer, only a couple of miles from the current development, I am disappointed that Southern Water's proposal has been modified to treat effluent in this way, away from the original fresh water reservoir the local community was sold. On top of this Southern Water are increasing our bills.<br><br>Southern Water have a poor track record when it comes to waste water management; and yet the proposal is for them to use the very water being stored for consumption. The investment would be better spent on the managing and maintaining their existing infrastructure. | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make, and various Price Control Deliverables set by Ofwat ensure that poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year, this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector: https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector. It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This would also require the entire housing stock across our supply area to undergo modifications in |

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| | | internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. However, we will continue to revisit and review the potential wider use of both MAR and ASR again within future resource planning. |
| WRMP21 | Dear Sirs, Whatever happened to the proposed reservoir to be built at Warnham near Horsham, West Sussex. For at least the last 30 years this proposal has rumbled in the background before no longer being discussed. In view of the considerable numbers of new housing developments in the area and increasing pressures on water in this area, why has this project been abandoned?. The River Arun cannot support a further increase in the amount of water being taken from it, without serious damage to the local environment, particularly to the Wild Brooks RSPB at Pulborough. I cannot see how a new reservoir in Havant will be of benefit to Horsham district, which is under great strain at present.<br>I would be grateful for your comments on this matter.<br>Yours faithfully | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third in Sussex (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP22 | Hi,<br>I object to your Southern Water WRMP.<br>How can you object to, and refuse to consider the cheaper and more environmentally alternative.<br>I agreed to the Havant Reservoir and attended several meetings.<br>At no time was " Recycled Sewage" raised as a supply of water.<br>We are not a third world Country. We do have a reasonable amount of rain. We have never had standpipes!<br>Why can't you draw water from the protected Chalk Streams but nearer the Sea.?<br>You should have a rethink and go for the Cheaper Option which is also more Environmentally Friendly.<br>Regards | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see here.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators, and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/ |
| WRMP23 | Dear Sir/Madam, | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | I am very concerned regarding Southern Water's revised draft WRMP and it is a plan as a local resident I do protest.<br><br>The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers.<br><br>SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br><br>We get plenty of rain in winter, Southern Water should be developing solutions which store that free natural water for use in dry summers.<br><br>Not a sustainable solution, especially building it more than 40km from where the recycled water is needed. The treatment & energy costs to transport the water 365 days a year will be huge.<br><br>It risks turning people away from tap water due to the lack of trust in the water companies, creating a new used plastic water bottle mountain, especially as mixed reservoir water will taste different to spring water.<br><br>Significant additional risk of pollution from the recycling plant, especially if it is not maintained properly by Southern Water. No independent monitoring of the discharge into the reservoir is planned.<br><br>SW waste more than 92 million litres of treated water per day to leakage. SW also have a shocking performance on mains renewal, expecting water mains to last 1000 years. More challenging targets on leakage & mains renewal need to be set and delivered urgently. Reducing leakage by 50% in 2050 is just not good enough<br><br>This is a plan that is simply good enough. I don't trust Southern Water, this plan shouldn't be allowed and I want it abandoned.<br><br>regards, | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short, sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year, this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector: https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector. It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>The majority of the pipelines will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a |

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| | | number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |
| WRMP24 | I am a customer of Portsmouth Water (water supply) and Southern Water (sewage processing). I object to Southern Water's WRMP on the grounds that it will result in a lower quality water supply.<br>Portsmouth Water supply today is spring water requiring the minimum of processing, resulting in tap water quality which is among the best in the country. If Southern Water's WRMP is implemented, my supply will include recycled water, which may well meet minimum standards, but will not meet the standard of quality that I get today. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP25 | I strongly oppose this, the residents of Havant were sold this proposal many years ago by an untruthful Portsmouth Water and Southern Water. We were told this reservoir would be filled with pure spring water, it would offer leisure facilities etc. All lies.<br>These two companies conspired with each other to hoodwink the residents and have changed their plans substantially. We do NOT consent to this plan. Go back and start again. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. |
| WRMP26 | Dear Sirs,<br><br>I do feel that I need to respond to the Southern Water proposal at Havant Thicket.<br><br>I am afraid, very sadly, that no one in their right mind trusts Southern Water, their activities are solely profit driven and in common with a lot of the water industry they are not in a good financial situation. On that basis this proposal is purely profit driven, to think that it is for the benefit of the consumers is taking a rather naive attitude.<br><br>The first thing I tried to do was to try to find out how much water is leaked from Southern Water fresh water distribution system. I am fairly good at finding things out on the internet - could I find anything, the answer is a big NO.<br><br>Beneath the facade that they are trying to create, in my personal view they are not a honest company and on that basis I do not think that this project should go ahead, and instead they should be directing all their energies to fixing the leaks in their fresh water distribution system and maintaining their infrastructure properly. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>The leakage reduction target set by the Government is 50% by 2050.we are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can |

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| | | realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. Should you wish to see our 2023-24 leakage performance it is available in southern-water-annual-report-2023-24.pdf on page 47.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP27 | Dear Sir/Madam,<br><br>Why turning our sewage into Tap Water won't solve the drinking water problem.<br><br>There have been many years of research undertaken into this subject and as recently as April 2023 researchers have found that contaminants like microplastics and formaldehyde remain in the water even after highly advanced treatment.<br><br>These contaminants are linked to cancer, metabolic problems, heart disease, and more. Many of these toxins, including PFAS forever chemicals, are notoriously difficult to remove.<br>Researchers have found that in addition to PFAS, contaminants like microplastics and formaldehyde remain in the water even after advanced treatment. These contaminants are linked to cancer, metabolic problems, heart disease, and more.<br>It's impossible to monitor every potential toxin in a direct potable reuse system. For what toxins we do know about, many are unregulated, and we don't know how they affect human health with low-level, long-term exposure. Moreover, many chemicals become even more dangerous when they interact with each other. To make matters worse, these toxic chemicals can accumulate in the water over time. In direct potable reuse, the water cycles from drain to tap, over and over again, with no environmental buffer to dilute them.<br>Toilet-to-Tap Projects Have Serious Environmental Problems<br>Direct potable reuse projects often do more harm than good to the environment. While toilet-to-tap, along with other reuse schemes, is sometimes called water "recycling," it isn't as green as that label would suggest.<br>The advanced treatment systems that make reuse possible use a lot of energy. If they're powered by fossil fuels on the grid, that means they also have a higher carbon footprint than regular water treatment.<br>They're also bad for marine life. The treatment process creates toxic waste brines, which contain PFAS and other dangerous chemicals. Coastal municipalities often get rid of their brines for cheap by dumping them into the ocean, which can disrupt ecosystems and poison wildlife. | Thank you for reviewing our rdWRMP24 and providing feedback.<br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, |

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| | Meanwhile, in inland areas, toilet-to-tap projects can disrupt natural river flows. They take water in but don't return it to waterways, which would lower water levels in vital rivers and streams. We've already seen what happens when these levels fall, thanks to the drought in the West. Downstream communities get less water, rivers dry up even if they have legal rights to the water source.<br>Our water crisis isn't just an environmental problem; it's an equity problem. Already, millions of people in the U.S. can't afford their water bills.<br>Direct potable reuse will worsen this problem, as utilities raise rates to cover the new technology. For example, in Nevada USA, direct potable reuse can cost up to 6.5 times higher than indirect potable reuse. Low-income households will struggle disproportionately to afford water.<br>At the same time, water companies have been abusing our river water with impunity. Every year, they've downed billions of gallons of raw sewerage all to expand their profits.<br>Not only are direct potable reuse projects risky — they distract us from the real solutions to our water problems. Governments should not be banking on toilet-to-tap and saddling low-income families with the bill. Instead, they must become better stewards of our existing water sources and rein in wasteful corporate water abusers.<br>Unfortunately for us all the Water Companies will continue to ignore these scientific facts in order to advance their profit at the expense of us all. Eventually when governments find that people are dying due to their disregard of these facts will the water companies be forced to do what we are all paying for, clean heathy drinking water. | which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP28 | Dear Sir,<br>I understand there is an unsavoury plan to pump treated recycled sewage into the Havant Thicket reservoir instead of the original plan to collect excess pure rain water for the Portsmouth Water area. What are they thinking? This will not work as after many years of operation as the water purifying plant will develop faults and operator error will occur to destroy the purity of the reservoir's water. Being a retired engineer I guarantee this will happen someday whatever the 'experts' say and what will that cost to correct every time? People don't need or want that.<br>Also the incredibly expensive plan of laying a 40km pipeline from the reservoir to [redacted] and to pump water at an apparent estimated energy cost of £3,000,000 every year has to be the craziest of solutions with yet another pipe to leak after 100 years. Apparently this system might not even start up until 2035 – which is crazy as well as being a phenomenally overpriced, 'high carbon' way of doing things. This<br>thinking has apparently has not helped for many years, delaying the commencement of work on our locally needed reservoir until now.<br>Southern Water really need to rethink this very expensive out-of-area idea altogether and keep it local to Southampton. I also understand they are even contemplating funding<br>water from Norway! That means another inexplicable huge carbon and energy cost.<br>As I see it, as soon as possible, they should stop continually extracting water from the upper reaches of rivers and take it from as far downstream as possible where they will get the same quantity of water and save our precious chalk streams during the dry seasons. They could also use aquifers local to the Southampton area to collect clean excess rain water and even create a local reservoir too. This apparently | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. However, we will continue to revisit and review the potential wider use of both MAR and ASR again within future resource planning.<br><br>Regarding the environmental impacts of sea tankering, this is no longer included in our plan. |

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| | could usefully be up and running much sooner, keep it all local to the area and at a fraction of the initial and annual running costs, as well as keeping all our water bills down.<br>All this has done so far is to delay our planned use of a local fresh water reservoir!<br>Yours faithfully, | As part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/<br><br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. |
| WRMP29 | Dear Sir or Madam,<br>I am concerned about the effluent recycling planned and its involvement of the Havant Thicket reservoir. We were told of all the benefits of this reservoir and why cutting down ancient woodland was worthwhile. Now we discover that the reservoir will not be the clean environment for nature and leisure we were promised but a tank to mix water from aquifers with recycled effluent.<br>It strikes me that it is a very expensive option that will do a lot of harm in all sorts of ways. However much filtering you do, you can never filter out medicines and dog flea treatments.<br>To protect the chalk streams, I think extraction down river is perfectly feasible. I also think we should be working on the technology to use aquifers for storage.<br>There is much more Southern Water could do to fix the pipes and reduce wastage. This needs to be tackled first.<br>Certainly the idea of bringing water from Norway as a stopgap is far too expensive. We have plenty of rain, we just need to gather it, store it and use it efficiently.<br>I ask you to reject the current plans and have Southern Water rethink and then to consult fully and transparently.<br>Kind regards | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. However, we will continue to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | | this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the financial costs of sea tankering, this option is no longer included in our plan. |
| WRMP30 | Hello<br><br>I am writing to object to your revised draft water resources management plan, I do not see the benefit outweighing the risks/environmental damage and cost.<br><br>Tankering water from Norway in a drought can not be accepted as a credible drought plan and the environmental concerns with this should not be discounted.<br><br>Spirally costs program delays and significant environment effects and the need to operate 365 days a year cannot make this the best value for customers<br><br>Assurances by southern water that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met. There has been a real lack of customer engagement or consultation<br><br>For these reasons and many more I oppose these plans | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the environmental impacts and financial costs of sea tankering, this is no longer included in our plan.<br><br>As part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/<br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br>We have received 1176 responses as part of rdWRMP24 consultation.<br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We made clear in our Summer 2024 Consultation for the Hampshire Water Transfer and Water Recycling Project that water quality modelling and assessment work was ongoing and would be fully reported in our Development Consent Order application. As that work has progressed, we are now consulting on it as part of our Spring 2025 Consultation.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order |

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| | | application. The energy usage information used to support that will be appended to the assessment. |
| WRMP31 | This email is by way of an OBJECTION to and comment upon Southern Water draft Management Plan (2024) during the CONSULTATION period- to build new infrastructure to recycle treated effluent into the water supply by additional treatment, movement and storage infrastructure.<br><br>• The process to agree that the proposals, within the plan, are a national infrastructure project to be considered by DEFRA is abusive to local engagement and consultation and has disadvantaged local communities in considering the issues and future options<br><br>• Southern Water has not undertaken sufficient local publicity, engagement and explanation of the proposals and the evidence upon which they may be based to ensure that the proposals are necessary and that they represent the best value against sound scientific evidence , cost benefit analysis and respect for the environmental<br><br>• The revised draft plan presents as a single objective (recycling effluent into the water supply via a new infrastructure) with a just single alternative proposal to transport water from Europe to the UK- clearly not chosen for its comparable features.<br><br>• Within the plan there is no broad process to identify a range of possible future investments to ensure adequate and safe water supplies and management of waste; and consequently there is no sound and evidenced based cost benefit analysis nor a comparison with feasible alternative ways forward.<br><br>• The population estimates for the area do not appear to align with those within the National Census material and bring into doubt the need for the proposal set out; and consequently, it is difficult to evaluate the need for and cost effectiveness of the proposals.<br><br>• Southern Water leads the recently published bids (by a big margin) for consumer price increases at over 40% over the next 5 years and yet continues to manage an infrastructure that wastes 19 % of its treated water annually. The draft plan does not address this in the context of a bid for additional infrastructure funding.<br><br>• The policy to allow water companies to make profit from future infrastructure projects whilst not enforcing that existing infrastructure is properly maintained is a perverse incentive and counter-productive to best outcomes for consumers and the environment.<br><br>• In that there are no alternatives presented within the plan it is not possible to evaluate if alternatives might be more cost effective, more quickly delivered and have a more sustainable carbon footprint. These alternatives include additional reservoirs , rain water run off collection schemes, better river abstraction management, existing or new aquifer storage sites and better | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information. We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwelling occupancy, population in commercial properties and business counts. Following the publication of the latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered for each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | management of existing infrastructure - all of which are operating in many Countries and therefor evidence is available to evaluate alongside the current effluent recycling, movement and storage proposal.<br><br>• The proposal to build new and additional water pipe networks, and water treatment plants are potentially expensive to build, maintain and run - but these features also have a short life span: apparently 60 yrs., many of the alternative (including but not limited to those above) have longer life utility and potentially are cheaper to develop and maintain; and are potentially more environmentally friendly<br>• The Souther Water proposal contains a significant aggressive carbon footprint to create the new infrastructure and also to run it (for 60 years) , which is unlikely to be achievable within the Government target to be carbon neutral in energy production by 2030. The energy cost alone to run the proposed pumping network are considerable and will further add to the pressures on consumer bills.<br><br>• The proposal includes building a new water plant on a former land fill site with discharge into a natural Harbour: The risks of contamination as the new plant requires disturbing the land fill site are not fully identified nor addressed by sound science, construction methods and risk management<br><br>• The proposal includes pumping treated effluent into a natural source storage reservoir under construction locally (Havant Thicket) but also over 40km of new pipe work to move treated effluent to another storage site near Winchester - which includes water abstracted from the Rivers Itchen and Test. If local support might be obtained for recycling effluent into the treated water system, it seems very unlikely that pumping huge quantities of recycled water over 40km would be an environmentally sustainable and cost-effective solution. | this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP32 | I am writing to express my concerns about the Southern Water Draft Water Resources Management Plan for the following reasons:<br><br>* There appears to be no viable alternative solution to the problem of the disposal of the final effluent from the sewage works, should the proposed site be insufficient or fail. This could have a devastating impact upon the environment.<br><br>* The idea of importing water from Norway is environmentally poor and surely unnecessary in a country that receives excessive amounts of annual rain.<br><br>* As a matter of urgency, plans must be made for the localised storage of our excessive rainfall to be used in times of drought.<br><br>* This plan does not set out the best use of our money in terms of caring for our environment in a sustainable manner. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts, and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plants can be built in a modular fashion, i.e., a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms of being able to meet the anticipated demand, resilience to climate change, and delivering Environmental Destination. |

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| | * We need a far more in depth set of alternatives to this plan that are fully costed and take into account the potential impact upon our environment, utilising realistic data for future needs and usage.<br><br>* This plan is far too short sighted and short term. We need a longer term, well costed plan with sensible timescales, alternatives and a sense of vision that it will improve lives.<br><br>Thank you for your consideration. | Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding the environmental impacts of sea tankering, this option is no longer included in our plan. |
| WRMP33 | Dear Sir,<br>I object to the proposed Effluent Processing facility in Havant as a solution to potable water shortages in the Hampshire and West Sussex areas.<br><br>I appreciate that fresh Water Supply in this country has always presented challenges due to the archaic infrastructure that looses a significant percentage of available water due to leakage. Climate change now adds to the difficulties by probably reducing rainfall in our summer months. So I was pleased to hear that a new reservoir was approved for construction at Havant Thicket to catch fresh and store spring water for use in draught periods.<br><br>I'm now horrified to learn that, if current proposals go ahead, that as a Portsmouth Water Co customer, I could receive water that is a mixture of pure and processed Effluent Sourced Water from a Southern Water Co proposed effluent recycling facility in Havant<br><br>The effluent being processed would include domestic and industrial waste containing all manner of chemicals and bacteria. Apparently filtration / UV radiation is expected to make the water 'clean'. I'm do not see how a guarantee can be made for removal of all chemical contaminants which might from time to time be present.<br><br>Also preventive maintenance cannot 100% prevent all equipment failures. When a failure occurs contaminants could escape capture. Any contaminant not detected would pollute the reservoir making its contents unsafe. My understanding is that there is no commitment in the proposal to have the reservoir's 'effluent input' independently monitored to protect the reservoir and down stream water users<br><br>My preference would be to see a broader solution based upon increased water collection/storage in the wet winter months by further strategically positioned reservoir construction. Together with investment to refurbish the water distribution system to significantly reduce the wastage due to network leakage. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals, and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities, including "forever chemicals," in the purified recycled water produced. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period |
| WRMP34 | Good morning<br>Your inability to provide water for us to swim in does not bode well when considering your ridiculous notion that we should drink recycled sewage<br>You have shown yourselves to be incompetent and self serving<br>You are a disgrace | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP35 | Hi,<br>I am very concerned about Southern Waters plans to pump 30ml of partially treated sewage into the new Havant reservoir.<br><br>Planning says the reservoir must be filled with raw water from a chalk fed fresh water springs, so this is clearly a breach of planning.<br><br>Also effluent recycling using reverse osmosis hasn't been used in the UK before on drinking water so we don't know that it is safe to drink .<br><br>Also what happens if the treatment fails for some reason resulting in raw sewage being pumped into the reservoir?<br><br>Can I please urge you to stop the pumping of partially treated sewage I to the new reservoir.<br><br>Many thanks | Thank you for reviewing our rdWRMP24 and providing feedback.<br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals, and other impurities from water to create purified recycled water.<br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators, and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. |
| WRMP36 | I would like to object to Southern Water using the Havant Thicket Reservoir to siphon treated effluent into the system. As this is an unknown, scientific experiment on not only residents, but the environment. There are very, rare sensitive chalk aquifers underground, which sustain very rare flora and fauna. Interfering with such a sensitive ecosystem is very wrong and damaging. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. |
| WRMP37 | Objection to the effluent water scheme.<br><br>I am writing to you today to express my deepest concerns about the proposed schemes. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or |

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| | I am aware that DEFRA has rejected the previous SW draft WRMP and it is disappointing that the company has not revised their plans. An opportunity to do a more realistic review of water resources and evaluate possible solutions was missed.<br><br>To operate the opposed schemes comes with a huge carbon footprint and energy costs of £ 3 million just for the Hsmpshire scheme. There are alternative solutions. Why are they not considered?<br><br>My concerns regarding the SW draft plan are the following:<br>1.The plan does not seem to work with the predicted changes of climate change for our environment. There is plenty of rain water in the winter and it needs to be captured and stored for the summer.<br>2. SW have not completed a full review of the plan considering all alternative options. This is essential before more damage to our environment is done.<br>3. Sustainable options have not been prioritised.<br>4.The time scale is unrealistic.<br>5. SW should not be allowed to rely on use of the Candover drought option, Lower Itchen and Test drought orders.<br>6. Tinkering water from Norway in a draught cannot be accepted as a credible drought plan<br>7. Discrepancies in the prediction of population growth.<br>8. SW lose 100 mill lites of water per day through leaks, this is 19 % of all water abstracted from the environment. We need a more ambitious mains programme.<br>replacement.<br>9.SW have not taken account of the completion of Hampshire National Grid programme.<br>10.The investment model is not fit for purpose. It needs to be revised. Smaller more sustainable options are required and not large infrastructure schemes.<br>11. Possiblity of market trading for water credits is mentioned. This is dangerous as it could create a loophole for water companies and speculative developers to exploit to make money and not fix the problems.<br>12.Spiralling costs, program delays, significant environmental effects, lack of legacy and short life span IS NOT GOOD VALUE FOR MONEY.<br>13. The 40 km transfer to [redacted] from Havant Thicket reservoir has unacceptable high carbon impacts and greenhouse gas emissions.<br>14. The SW preliminary Environmental Information Report 2924 stated a likely significant effect on the marine environment from this scheme.<br>15.MOVING THE [redacted] ABSTRACTION TO THE TIDAL LIMIT WOULD BE BETTER. This is not mentioned.<br>16.Why is moving abstraction to the lower catchment of rivers not being prioritised?<br>17. Why are there not more challenging targets set for the delivery of the groundwater borehole schemes and Test managed aquifers recharge scheme in Hampshire?<br>18. The investigation of other aquifer storage schemes in Hampshire, The IOW and West Sussex should be prioritised! | 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable, we produced a non-technical summary document for those seeking a high-level understanding of our plan. You can view the publicly available documents on the link below:<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1176 responses as part of rdWRMP24 consultation.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwelling occupancy, population in commercial properties and business counts. Following the publication of the latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range from 7% to 34% growth at the company level between 2025 |

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| | 19. Despite allocated funds by OFWat no work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as back up.<br>20. Why is capacity at existing water treatment plants not increased?<br>21. Would it be better to develop smaller schemes, close to where water is needed?<br>22. Why is SW not investigating and bringing forward additional new reservoir schemes?<br>23. Reduction of usage of drinking water has not been seriously thought of. Liaison with customers, schools, business, agriculture, golf course etc. Too much water is wasted.<br>24. Critical documents have not been made available to the public. Why?<br>25. Customer preference has shown that more natural solutions as aquifer storage, reservoirs and catchment management are preferred.<br>26.Lack of adequate and meaningful engagement and consultation is evident.<br><br>I am very concerned about this scheme. The environmental damages are evident. The energy costs are huge for a short term solution. Nature has taught us that natural solutions must be considered wherever possible and it is possible in this case.<br>Do you want to look back in 30 years and recognise that you have been part of the destruction of the local environment?<br><br>Healthy drinking water is essential to us. I have no confidence that this will be provided to us by SW. We just need to see the state of our sea and rivers.<br>Object to this scheme and work with ecologists to find the best solution. | and 2075. The range of growth forecasts considered for each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts, and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br><br>Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings.<br><br>Affinity Water are investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We introduced our Water Saving Audit Programme in April 2024 to help businesses reduce water consumption and save money off their bill by offering a tailored solution depending on their industry and line of work. Our audits generally include fixing leaky loos, taps, showers etc. and/or fitting water-efficient devices as well as recommending other water efficiency improvements your business can make such as rainwater harvesting. The audit (and the fixes) are free and we've partnered with the charity Groundwork to deliver this initiative. |

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| | | More information here:<br>https://www.southernwater.co.uk/save-a-little-water/water-saving-audits/<br><br>Regarding the environmental impacts of water recycling, A consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP38 | I am emailing to object about Southern Water's Plans for Effluent Recycling and water management.<br><br>This is the 3rd or 4th time I have responded to recent consultations from Portsmouth Water and Southern Water. It appears as though a lot of the same proposals just keep getting recycled for comment again and again, and that no account appears to be taken of previous feedback.<br>In my view, the current plan is worse than previous ones. I am extremely concerned about the potential (almo-st guaranteed) pollution arising from this Plan.<br><br>My main concerns are:<br>1. The drought plan to tanker water from Norway. This seems ridiculous in many ways - very expensive, resource hungry in terms of fuel and time, doesn't do anything to address the drought problem, and quite unnecessary if Southern Water properly managed the water resources we have available to us.<br>2. 19% of all water that Southern Water abstracts is lost through leaks. Their plan to repair leaks is slow and ineffective. Repairing leaks should be a much higher priority and given more urgency. This would go a long way to meeting water needs.<br>3. The effluent recycling scheme is wrong on every count. If Southern Water more effectively managed and stored water resources, effluent recycling would not be needed. Effluent Recycling is an expensive option, not only financially, but also bad for the environment. The infrastructure required to manage this would be a huge undertaking, disruptive of the environment, polluting, and dangerous so close to the waters edge at BroadMarsh.<br>4. Based on Southern Waters' record over the past 10-20 years, it is almost guaranteed that they will put contaminated water into the Reservoir. Once contaminated water is put into the Reservoir, it will not be flushed away by sea tides or a river flow, the water will remain in the Reservoir. I feel they cannot be trusted and should not be allowed to pollute our drinking water.<br>5. Southern Water has already polluted Chichester Harbour and surrounding areas. This new Plan is likely to have a significant negative effect on the marine environment, as concentrated effluent will be regularly discharged into the Solent. In addition, recent studies show that the tides move this contaminated water back to the shoreline, making the sea potentially dangerous for those who use the sea for work or recreation.<br>6. I have had to actively seek out this information. I believe that this public consultation is being kept very quiet, in an effort to avoid feedback from the public. The public are not engaged in this Consultation, and this is wrong, as it is such an important issue for anyone who drinks water from their taps, and cares about the environment, and how their money is spent.<br><br>My preferred options are: | ‘Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>Regarding the financial costs of sea tankering, this option is no longer included in our plan.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much |

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| | i) move water abstractions from the upper catchment of rivers to the tidal limits<br>ii) aquifer storage to store surplus water in the winter, so that this water is available to use in the summer (or when it is dry)<br>iii) catch and store more rainfall. Keep this water out of the sewers, so that it does not just flush out to sea with the effluent.<br>iv) no effluent recycling. Reduce the need for expensive and long pipes moving water around the countryside, by being more efficient and effective at abstracting and storing water.<br><br>Please confirm that you have received this email, and advise me of the next steps. | shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area, and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders, and previous responders were all directly emailed regarding the consultation. We have received 1176 responses as part of rdWRMP24 consultation.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short, sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP39 | I write to you this evening as a Portsmouth-based customer of both Southern Water and Portsmouth Water. I have tried to keep well-informed about the proposal to use effluent recycling as the main way to deal with the expected water shortages predicted for our locality. I am totally opposed to this so-called solution to the water shortages forecast for us here in Hampshire. My opposition is based on several concerns which I am sure you will dismiss as unjustified and which have been communicated to you 100's if not 1000's of times. But I will persist in my objection.<br>Leakage: how dare you continue to ignore the persistent need to track down and repair the leaks in the failing supply system you are responsible for! Do you and the problem is halved! Your targets for such repair is far from acceptable. You must do better before you consider other works.<br>The (electrical) energy demanded to run such an ill-thought out recycling scheme is simply astronomical. Surely the alternatives proposed which are nature based and sustainable must be not only considered but work towards their implentation needs to begin soon to stop the continued degradation of our rivers and wider environment.<br>We need to find ways to store the amount of rainwater currently being wasted. The Havant Thicket reservoir should be the first of several such infrastructure projects.<br>Customers should be rewarded for good practice or penalised for wasteful malpractice of what is and will become increasingly more precious a resource. The public need to be made more | Thank you for reviewing our rdWRMP24 and providing feedback.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>We recognise that customer engagement is essential, and we are committed to ensuring that our customers are fully informed about our plans and their implications. We are continuously |

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| | accountable in their relationship with this much under-valued resource. This can be achieved if you properly engage with a better informed public. You have a duty to ensure you take the public with you on this journey or risk a lack of trust.<br>I know you will be keen to address my and the countless other objections to the effluent recycling scheme. Go back to the drawing board and rethink. And be quick! | working to improve our public engagement efforts and increase awareness of the importance of water conservation.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short, sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP40 | As a lay person I have found the 40 point list of concerns very disturbing. The very exiting of such a large list indicates to me that the current water plan has many objections which do not appear to being listened to and acted upon by the water authorities. We seem to been in a stalemate situation with no agreed plan to satisfy the issues other than having to escalate to higher authorities.<br>I strongly disagree with any plan to use the new Havant thicket as a dumping site for raw effluent. I don't see a plan to persuade the general public that recycling purified waste sewage into acceptable drinking water is a proven solution which has their support. Also the implications of pumping effluent 40 miles to [redacted] is a proven best solution, either from an environmental and cost standpoint.<br>In summary, my view is that the plan and delivery water in Hampshire and the management of its provision is not at all acceptable. We cannot stand still, so resolution of the issues raised with the water authorities needs immediate scrutiny and tracking by the government departments concerned to bring the suppliers and public into sync. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators, and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>We acknowledge the concerns raised regarding the communication and public engagement on the project. We are committed to increasing transparency and ensuring that customers have access to the necessary information to make informed decisions. Ongoing consultations and further detailed studies will continue to assess the environmental and economic impacts of the project. Feedback from stakeholders is essential, and we remain open to engagement on the most effective ways to manage future water resources. |
| WRMP41 | Hello there<br>I wish to register my extremely strong objection to Southern Water's Water Resources Plan.<br>The adverse environmental impact will be huge - given the infrastructure needed - Langstone Harbour and our very precious chalk streams, of which there are so few left in the world, need protecting.<br>Recycled effluent has not been tried in this country before and Southern Water did not make this scheme known before Portsmouth water were given the go-ahead for the new reservoir. Customers, like me, do not wish to drink recycled effluent.<br>It will b a hugely expensive project. Meanwhile, Southern Water already loses a huge percentage of the water they extract though leakages. This is ridiculous! Money should not be | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact, etc., in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project |

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| | being wasted on this huge project whilst so many leakages are allowed to go unchecked. Even if the project were to go ahead (& I sincerely hope it doesn't) those leakages will not have been sorted out so millions of gallons of water will continue to go to waste. This water is paid for by the customer which is, in itself, preposterous!<br>Many engineers, scientists, environmental groups have looked into this project and do not agree with it.<br>There must be better ways forward.<br>Thank you | (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators, and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We acknowledge concerns about the environmental impact of infrastructure development and are committed to working with environmental groups, scientists, and engineers to refine and assess the best long-term solutions. We continue to explore alternative methods, including nature-based solutions and sustainable water management, as part of our wider strategic planning for water security. |
| WRMP42 | This proposed plan has been brought to my notice as a member of more than one Hampshire climate action group.<br>Given the increasing need to manage natural resources as well as possible, it is hard to accept that the scheme proposed for effluent recycling which involves the creation of expensive infrastructure producing major carbon emissions both in its making and functioning, is the right option compared with achieving more reservoirs and use of aquifers to effectively retain the increased rain we are already experiencing.<br>The time and money given to the development of a scheme insufficiently improved after its previous rejection by DEFRA, would be much better spent on addressing the unforgivable level of leakage overseen by this company. Their targets for improvement in this aspect of their business show a disgraceful lack of urgency.<br>Clean drinking water is a public right; recycled effluent, however carefully treated and monitored should remain well down any list of proposals to achieve it. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations, the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst benefiting long-term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly |

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| | | committed to reducing the greenhouse gas emissions released through the delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators, and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>We acknowledge concerns that alternative approaches, such as improved reservoir storage and aquifer recharge, may offer a more sustainable long-term solution. We continue to assess and refine our strategies, ensuring that all options align with both environmental sustainability and best value for customers. |
| WRMP43 | Please see my objections below to Southern Water's revised 2024 Draft Water Resources Management Plan which includes effluent recycling.<br><br>The local weather brings plenty of rainfall in winter, so Southern Water should be developing solutions to store that free, natural water for use in the dry summer period.<br>I understand that a free water-butt scheme has been trialled on the Isle of Wight, so a similar trial in this area would be an initial step. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding water butts, our business customers are able to claim a free water butt from us: https://www.southernwater.co.uk/save-a-little-water/saving-water-in-your-business/water-butts-scheme/<br><br>Slow-drain water butts are also effective in reducing water run-off and decreasing the pressure on storm sewers, as our pilot scheme on the Isle of Wight has shown, and where we |

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| | Southern Water lose 100 millions of litres of water every day to leaks, which represents 19% of the water they abstract from the environment being wasted through leakage in their distribution system. A comprehensive programme of maintenance and repair is needed for them to get leakage under control in the existing infrastructure.<br><br>More specifically, the plan to recycle effluent from [redacted] sewage works, to a new treatment plant at Havant, using Havant Thicket Reservoir for storage, then transporting the water over 40km to [redacted] for treatment raises several environmental concerns as follows.<br><br>* Langstone Harbour is a Site of Special Scientific Interest. The recycling plant construction work will take place adjacent to the harbour muds used by species such as Brent Geese and waders.<br>* The recycling plant buildings and tanks will be up to 13m high, causing a significant visual impact. If the Recycling Plant area is lit at night this will add to its visibility from long distance and will impact the local night time ecology, including bats.<br><br>* Detrimental impact on the Solent from discharge of concentrated reject water. There is significant concern about the impact of more concentrated reject water from the effluent recycling process being discharged into the Solent via the Eastney Long Sea Outfall. The Southern Water assessment indicates a 'likely significant effect' in their Preliminary Environmental Information Report.<br><br>* Effluent recycling was primarily proposed for drought periods, but Southern Water have indicated that they will operate the plant and pipelines at a capacity of 30 million litres every day. This represents a huge amount of treatment chemicals and energy being used to treat and pump vast quantities of water 40km to [redacted]. This is clearly not a sustainable environmental solution.<br><br>* The effluent recycling aspect of this raises particular concerns, which, when combined with a lack of trust in the water companies risks pushing people away from tap water resulting in an increase in waste plastic water bottles.<br><br>Southern Water should be developing safer, more sustainable solutions, as well as reducing the existing leakage rate.<br><br>Yours faithfully | have now installed over 4600 water butts: https://www.southernwater.co.uk/latest-news/free-water-butt-initiative-expands-to-gurnard-on-the-isle-of-wight/<br><br>These water butts have a drain installed halfway up, allowing the top half to slowly drain into the network over several hours. This way, around 100 litres is left empty for the next time it rains. Following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate, and in Fairlight, East Sussex.<br><br>On leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Portsmouth Harbour WTW is already in existence. The water recycling plant will be designed to be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements. The majority of the pipelines will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan.<br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available both in the summer and winter.<br><br>There is significant concern about the impact of more concentrated reject water from the effluent recycling process being discharged into the Solent via the Eastney Long Sea Outfall. The Southern Water assessment indicates a 'likely significant effect' in their Preliminary Environmental Information Report. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. Regarding storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We acknowledge concerns regarding the environmental impact and sustainability of the effluent recycling scheme. The plan aims to ensure the security of water supply while balancing environmental and operational considerations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP44 | Dear Secretary of State Reed,<br>We understand that the government is keen to promote national infrastructure projects which is to be applauded. Amongst those being put forward is the Southern Water's 'Water Resources Management Plan' whereby the Portsmouth Water's Havant Thicket Reservoir will be used for recycled effluent from the SW's [redacted] Water Treatment Works. This action will affect communities in East Hampshire and the western communities in West Sussex.<br><br>This project requires the recycling of effluent to create an end product of potable water. This has never been done before in this country. Portsmouth Water received planning permission for its Havant Thicket Reservoir because it will be filled with the spring fed waters from the aquifers of Bedhampton. This was fully agreed upon by Havant Borough Council, and all the communities. Since then Southern Water have retrospectively requested planning permission to undermine this situation to the disquiet of all the Portsmouth Water customers.<br><br>This is a project that is a public utility paid for by the taxpayers which has had very little consultation and oversightand which will involve a system never before used in the UK. We are aware that Southern Water has not followed the guidelines to ensure the full engagement of the communities during the formative years. This is indicative of why there is a general consumer distrust in Southern Water and the water sector generally.<br><br>We have deep concerns over the efficacy of this whole project which, as it stands, will impact the health of the communities and future generations together with lasting damage to the environment. The possibility of hundreds of thousands of customers using single use bottled water on a daily basis is very real. There has been very little action by Southern Water to offer and research alternative less costly and less damaging alternatives - Tanking water from Norway is not a financial nor sustainable alternative. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps |

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| | As a result action groups have come together to express to you, as Secretary of State, their deep concerns over the integrity of the future of their drinking water and we request the appropriate authorities to consent to the following action:<br><br>□ An in depth independent review of the entire proposed infrastructure by independent qualified professionals in this field be published.<br>□ An in depth independent review of the ability for SW's recycling engineering to satisfactorily cleanse the recycled effluent removing all known chemical pollutants and pharmaceutical contaminants by independent specialists in this field.<br>□ An in depth independent review of the costings of all the proposed infrastructure, pipes, pumping stations, etc. by independent financial advisers.<br>□ And a costings of the on going maintenance required for a project that will be required to run daily all year round and not just in drought conditions and to forecast the life time of such a project.<br>□ An independent review of the state of the infill-site at Broadmarsh which will be cut open to enable all the 45kms of piping required to transfer the water to the [redacted] pumping station and beyond.<br>□ And for the forecasting of the chemical and health impacts the opening of this infill site will have on the harbour and communities. | will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>The financial and operational feasibility of our infrastructure investments, including the long-term maintenance and lifecycle costs, have been assessed as part of our regulatory submission. The overall cost of the HWTWRP has been scrutinised by Ofwat and will continue to be reviewed in upcoming assessments. We will ensure that all infrastructure investments provide the best value for customers while maintaining environmental sustainability.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The consultation will also include further analysis of the cost implications and alternative options for meeting long-term water supply needs.<br><br>We appreciate your feedback and will continue to engage with stakeholders to ensure transparency and accountability in our decision-making process. |
| WRMP45 | I wish to raise my concerns and objections to Southern Waters proposed Water resources management plan (wrmp).First of all however I would like to point out that as a customer of Southern Water ( of which I have no choice) I have not been contacted or consulted, either through email, bills, or publicity through the media digital or conventional, posters radio advertisements or flyers for example, about any proposed changes or projects, (It is like they have been knocking on my door with a sponge and wonder why I haven't opened the door).That will affect the supply of water to my home or where and how this would be achieved. I was made aware of the wrmp by a flyer from the Green Party. At this meeting the wrmp was broken | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>On public consultation, our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non- |

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| | down into a format and length that was universally understood. The wrmp came across as being onerous with regard to capital expenditure and ludicrous in its proposed alternative should the scheme be rejected, more on this below.<br><br>I would like to object to the wrmp as<br>There has been a lack of public consultation.<br><br>The way in which water companies are rewarded financially for infrastructure would possibly lead to over elaborate grandiose inefficient projects, as they are financially rewarding . Where as repairing leaking existing infrastructure is not (which could lead to up to a 20% reduction in wasted drinking water. This constant leakage must also be causing an untold amount of subterranean damage which could destabilise ground conditions across the region.<br><br>Southern Water have proposed to “import” water from Norway in tankers to cope with Draught conditions!! What is the cost of this financially and environmentally? Has Southern water hired a dedicated berth for this purpose? As i’m certain that berths are limited and shipping would have to wait for an available berth otherwise. What a ludicrous proposal! Not to mention the environmental impact of allowing this soft water to escape through the existing leaking distribution network in to a hard water ecosystem with many SSSI’s in the region. I feel certain it’s only part of the wrmp as joke or threat to expedite their proffered proposal.<br><br>I accept that we are having dryer summers but it is well reported that we are having much wetter winters. There are no alternatives in the wrmp to store water in the perfectly porous chalk rock strata or proposals for more reservoirs. Talking of which Havant thicket. A new reservoir that was supposed to store spring water for drinking purposes. Is now going to be allowed to have part treated water stored in it! So we are now going to Store partially treated water in a reservoir! I felt the need to state this twice I have not been to the North Pole but if do go, I know a coat would be a good idea I also know that storing partially treated water in reservoir or heaven forbid untreated water released in flood / heavy rainfall conditions (see Southern Waters track record for this) would be disastrous. Havant Thicket is after all a RESEVOIR with no natural flow through! And untreated water would seep into the ecosystem of the resevoir (see lake Windermere as an example)<br><br>It would appear that having had the previous wrmp rejected by DEFRA the only new addition to their failed attempt is to threaten tankers of water to cope with any shortfall. It looks like they have handed the same homework in again and are expecting a A for their efforts . I hope they will receive a must try harder do it again as well as detention. | Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company’s history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding sea tankering, this option is no longer included in our plan. However due to the large amount of water that could be brought in by sea tanker if this option were used (45,000,000 litres per day), a port with a suitably large enough berthing location (>10m deep) would be required. This berthing location would also require an area of storage (open or closed) to be provided for offloading/delivery, with space for forward transfer to an appropriate water supply works. Five potential sites have been assessed for suitability:<br>• Southampton dock (container dock and dry dock), with connectivity to the network via Test Surface Water WSW |

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| | | • Bury Marsh jetty, Southampton, with connectivity to the network via Test Surface Water WSW<br>• Calshot Marshes port, IoW with connectivity to the network via the IoW<br>• Fawley refinery jetty, with connectivity via the current SWS pipework supply to the refinery<br>• Shoreham harbour, Shoreham-by-Sea, where no immediate connectivity was identified.<br><br>At present the most suitable site has been assessed as Southampton dock, subject to agreement with key stakeholders, including the Port of Southampton, the Harbour Commissioners and the Marine Management Organisation.<br><br>Regarding the financial costs of sea tankering, this option is no longer included in our plan.<br><br>Regarding the environmental impacts of sea tankering, this option is no longer included in our plan. As part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/. We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. |
| WRMP46 | I would like to put in writing my objection to the current proposals for the Havant Thicket recycling water development. Having read all the information provided, it is my concern that this is an ill thought out project, that is excessively expensive, and will not improve the way in which water and sewage are managed. I believe that alternative projects should be persued would be far more cost effective, without having residents drink effluent recycling. I am seriously concerned for the public health of customers, impact on the overall local environnement; destruction of natural habitats and the risks of pollution to our local rivers and seas.<br>Yours sincerely | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP47 | With regards to the revised draft Water Resources Management Plan by Southern Water - I am emailing you to strongly object to the plan.<br><br>There are 40 detailed reasons below why it is a not a good idea, but the overarching concern is that Southern Water are not a reliable partner to deal with our drinking water in a correct and responsible manner which has been demonstrated over the past few years. And, if Southern Water were to fix their leaks in a responsive and adequate way, there would be no need to | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

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| | recycle sewage water for drinking water, as there would be a more than adequate supply (even without the new reservoir).<br><br>[redacted] I would be grateful if you could also take up this cause, as thus far, you have been invisible when it comes to the concerns of probably the majority of your constituents.<br><br>1<br>The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers. (For further detail refer to item A below).<br>2<br>SW have not completed a full review of the plan considering all alternative options as "a full re-appraisal exercise was not considered time or cost beneficial" (Annex 20, page 3). Given the importance of finding immediate solutions for the rivers Test and Itchen and at Pulborough, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. More sustainable options previously 'parked' by SW which work with predicted climate changes should have been more robustly assessed and included in the revised draft plan.<br>3<br>It is clear that SW have only focused on identifying options to fill the gap as a result of the delay to recycling options in Hampshire and at Littlehampton (Annex 20, page 1 and 3) instead of seriously looking at prioritising more sustainable options.<br>4<br>The timescales for 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 precious and iconic chalk rivers with no solution for longer.<br>5<br>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. (For more detail refer to item B below.)<br>6<br>SW should not be allowed to rely on continued use of the Candover drought option, Lower Itchen and Test drought orders, while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered as proposed (Annex 20, page 1 and 2), as it is inevitable that the Hampshire recycling scheme will be delayed further and will not be available in 2035, a more sustainable solution must be developed.<br>7 | 2) Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>3) The purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard.<br><br>4) With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>5, 6) It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>7) With regard to the viability of sea tankering, our Water Resources Management Plan (WRMP) looks at our future water needs from 2025 to 2075. All our water supply options are continually appraised as part of our adaptive planning process and sea tankering is one water supply option that we considered and have now excluded it from our plan.<br><br>8) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a |

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| | Tankering water from Norway in a drought cannot be accepted as a credible drought plan. (For more detail refer to item C below).<br>8<br>SW are unnecessarily pessimistic in their assumptions regarding population growth and this is driving a large demand deficit. The information provided is also contradictory with Annex 7b forecasting 23.56% growth and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible. (For more detail refer to item D below.)<br>9<br>Assuming high levels of abstraction reform is over precautionary when what will be required in future is currently very uncertain as SW environmental studies are still ongoing. This is driving a large demand deficit which helps SW justify their unsustainable effluent recycling schemes. (For more detail refer to item D below.)<br>Assuming no abstraction at all even in winter from the rivers Itchen and Rother is not appropriate and over precautionary. (For more detail refer to item E below.)<br>10<br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control.<br>An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050, rather than the 53% leakage reduction target they have set themselves by 2050.<br>11<br>SW have not taken account of the completion of the Hampshire Grid improvement programme which 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 within Hampshire by merging existing zones could have changed the options appraisal process. (For more detail refer to item F below.)<br>12<br>The investment model is not fit for purpose it needs to be urgently revised 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, whereas it currently favours large infrastructure schemes which should be a last resort once more sustainable options have been exhausted. (For more detail refer to items K and L below.)<br>13<br>The possibility of market trading for 'water credits' is mentioned. This is a concern as it could create a new loophole for water companies and speculative developers to exploit to make money, while not actually doing anything to fix the problems faced.<br>14<br>Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers. | WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>9 & 10) The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>11a) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>11b) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>12) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes |

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| | 15<br>The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. (For more detail refer to item M below.)<br>16<br>SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br>17<br>The process of environmental assessment and screening methodology cannot be robust if unsustainable and environmentally damaging schemes like the Hampshire effluent recycling/transfer scheme get through. The scheme that in 2022 when it was selected had the highest environmental impact score.<br>18<br>For more information on the key concerns and environmental impacts associated with the Hampshire effluent recycling scheme via Havant Thicket Reservoir please refer to the Key Concerns page at this link.<br>Concerning option selection<br>19<br>Moving the [redacted] abstraction to the tidal limit would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. This is not mentioned as an option that has been considered in the SW Technical Report, nor Annex 20.<br>20<br>In the future SW indicate 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. Moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows in rivers to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. (Why is the solution of moving abstractions to the lower catchment of rivers not being prioritised for investigation as a more sustainable solution across the region?)<br>21<br>More challenging targets must be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control. Investigation and delivery should commence in 2025 to ensure these schemes are delivered as quickly as possible, to provide at least 13.8 Ml/d to help better manage resources in the catchments and protect the rivers Test and Itchen from drought orders. We need Defra and the regulators to strongly challenge on this to ensure a quicker delivery date. (For more detail refer to item H below.)<br>22<br>The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. This is essential and should be | and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>13) Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings. Affinity Water is investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br><br>14) Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>15) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>16) A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>17) We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact.<br><br>18) Noted<br><br>19, 20) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | prioritised and funded urgently so that these schemes can be included as feasible options. (For more detail refer to item G below.)<br>23<br>Proposed schemes to recycle water currently wasted at the [redacted] and Test Surface Water WSW should be prioritised more urgently to help minimise abstraction on the Test and Itchen all the time, not only in a drought (Annex 20, page 32).<br>24<br>No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme. A scheme previously indicated to be feasible with sites that are closer to where the water is needed. (For more detail refer to item J below.)<br>25<br>Negotiations with a very large industrial water user in South Hampshire should have been brought forward as a priority, to explore alternative supply options when the contract expires in 2026, to free up drinking water for SW customers in a drought (Annex 20, page 6) and provide more certainty for the plan.<br>Could a desalination plant that trials research into alternative technology, potential uses for the hyper saline solution and reducing energy consumption be a way forward for this site (Annex 20, page 30 refers) perhaps in partnership with industry.<br>26<br>In West Sussex the need for network upgrades is being used as an excuse not to bring forward schemes at existing works that would increase supply (Annex 20, Appendix A). If all of these schemes rejected for this reason were brought forward, they could deliver more than 20Ml/d of water to the Central Region. This is more water than is to be provided by the proposed Littlehampton (Ford) effluent recycling scheme which will discharge to the Western Rother. The necessary network upgrades in West Sussex should form part of the plan. Network upgrades are taking place in Hampshire to address such concerns, why not in West Sussex?<br>27<br>Across the Western and 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 18 Ml/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.<br>28<br>Multiple cheaper and more sustainable schemes have been rejected by SW because they 'cannot be delivered in time' (presumably this means by 2030).<br>17 schemes in Hampshire and IOW (Western Area) could deliver at least 42 Ml/d. | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>21) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>22) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>23) With regard to prioritisation of recycling water at River Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. More crucially, under some of the drought conditions covered by WRMP24, it is unlikely that River Itchen WSW would be running. Therefore, this scheme would provide no supply benefit in a drought. However options to reduce process losses will be considered for WRMP29.<br><br>24) We are focussed on delivering the HWTWRP by 2033-34. The alternative option to use Fareham for recycling water has not been shelved but is put on hold.<br><br>25) We will be exploring the option of amending the bulk supply agreement with a large industrial user in HSW WRZ when the existing contract expires in 2026. However, we are not planning to consider any changes to the bulk supply agreement for WRMP24. We mention options relating to this large industrial user in Annex 20 of our fdWRMP24.<br><br>26) Network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br><br>27) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences, which typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods.<br><br>28) Notwithstanding the fact that these 17 schemes are not explicitly identified in this query, there is little benefit in developing 17 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030.<br><br>29) We have looked at over 50 reservoir options as part of our options appraisal process over the last 3 WRMP cycles. These are not taken forward due to environmental concerns that will |

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| | 7 schemes in West Sussex (Central Area) could deliver at least 18 Ml/d<br>Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are putting all of their 'eggs in one basket'. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>29<br>SW are still not urgently investigating and bringing forward additional new reservoir schemes in the short to medium term, despite this being customers preferred choice. The delivery of the River Adur project is not scheduled until 2039/40, no other reservoir schemes are in the pipeline in Hampshire or West Sussex in the revised draft plan.<br>30<br>Groundwater schemes on the Isle of Wight (IOW) are not brought forward as the water gained cannot be transferred to the mainland to help the rivers Test and Itchen in a drought (Annex 20, page 5-6). However, if implemented they would reduce the amount of water that needs to be transferred from Southampton to the IOW providing a benefit that should be pursued.<br>31<br>The timescale for delivery of ten years should not be seen as a valid reason to reject provision of a bi-directional link between the IOW and the mainland, especially as it could allow water to be used more flexibly in a drought, including use of future spare water from Sandown.<br>32<br>There has been little proactive work by SW to investigate buying or trading licences with private supply users across the region. In a restricted document supporting the previous draft plan it indicated buying just one licence could deliver 19.7 Ml/d. There should be more proactive investigation and negotiation by SW to buy existing private abstraction licences, this in turn would then open up the potential for a more flexible approach to the use of licences within a catchment to meet water supply needs and environmental objectives.<br>33<br>Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to reduce their use of drinking water for non-potable uses. This can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions.<br>34<br>The free water butt scheme trialled on the IOW should be rolled out across the SW supply area to customers as a priority.<br>35<br>To read about a strategy for a better way forward please refer to the Water Matters page on 'A better way forward' at this link.<br>Concerning inadequate consultation with water users and affected communities<br>36<br>Critical documents 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. In fact there are more documents restricted in 2024, than there were in 2022. Is this a deliberate play to hide important information? As SW | make it difficult to get planning permission. However, we review these options for each WRMP cycle and will review them again for WRMP29.<br><br>30) Our plan includes two groundwater schemes on the IOW to provide up to 3.4Ml/d by 2040.<br><br>31) The delivery time of an option is the reason for rejection only in cases where water is needed earlier than the option can be delivered. The delivery time in itself is not a reason for rejecting an option.<br><br>32) We are open to licence trading. The Sittingbourne industrial re-use scheme in our Kent area is effectively a licence trading scheme that will provide up to 8Ml/d from 2030-31 onward.<br><br>33) Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency.<br><br>34) Regarding water butts, following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>35) Noted<br><br>36) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>37) We consulted extensively with our customers and stakeholder before publishing our dWRMP24 and solicited their views on the different option types. However, we have a statutory duty to maintain uninterrupted supply of water in all but the most extreme weather conditions, which may mean selecting options less preferred by customers. |

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| | 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. Other water companies made this information more accessible.<br>37<br>Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling?<br>38<br>Assurances given by SW that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met.<br>39<br>Lack of adequate and meaningful engagement /consultation with customers;<br>– A very significant alteration is taking place to customer's water supply with the source changing from river, spring or groundwater to recycled effluent. SW should be proactively engaging with all their customers to get their feedback on this material change.<br><br>– 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 the [redacted] desalination scheme was rejected, and the WRMP19 back-up option of discharging recycled effluent to the River Itchen was also 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 a full public consultation. This did not happen.<br><br>– As a result, 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.<br><br>– At the time of previous consultations (2020 to 2022) posters were not even placed at 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.<br>40<br>The consultation documents are vast, very repetitive and fail to provide important information, or make it restricted and inaccessible, making it very difficult for a lay person to understand/get through the consultation reports. Is this intentional?<br>Since this is a 'once-in-a-generation' chance to address future water needs, there needs to be a more open discussion about moving to a more sustainable approach which works with predicted climate change, not against it. | 38) The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We made clear in our Summer 2024 Consultation for the Hampshire Water Transfer and Water Recycling Project that water quality modelling and assessment work was ongoing and would be fully reported in our Development Consent Order application. As that work has progressed, we are now consulting on it as part of our Spring 2025 Consultation.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order application. The energy usage information used to support that will be appended to the assessment.<br><br>39) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and |

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| | | covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>40) We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan |
| WRMP48 | I am writing as a concerned resident who lives close to the new Havant Thicket Reservoir site, to object to Southern Water's (SW) plan to use this facility as part of its effluent recycling strategy, and in which SW and Portsmouth Water (PW) have deliberately misled residents and other stakeholders about their intentions for the new reservoir.<br><br>The majority of local people were supportive of PW's proposal to create a storage facility for fresh water from our local aquifers, extracted via Bedhampton Springs. At no time during the Planning consultation was recycling of effluent mentioned and I am convinced that local support would not have been forthcoming had this been known. This was a flagrant breach of trust by PW and SW which could have changed the outcome of the planning application had it been stated at the outset.<br><br>It was heartening therefore that after the great public response to DEFRA, objecting to SW's plan to pump treated [redacted] effluent into Havant Thicket Reservoir, the Plan did get rejected. SW were told to think again, but rather than look at more sustainable options that might undermine their case for recycling effluent, they have effectively regurgitated their old Plan, giving lots of reasons why the better options cannot be developed quickly enough. SW say the effluent recycling scheme still remains their best option - with the addition of a nonsensical proposal to tanker water from Norway to Southampton in a drought to plug the gap in their plan to 2035!<br><br>There are numerous reasons for objection, both technical and procedural, listed in the addenda below, which lean on much greater knowledge than I have about the water industry, but I can summarise them as follows:<br><br>* In the UK we only collect 1% of rainfall. We need a plan that works with climate change to collect more water in the predicted wetter winters and to store it for use in drier summers, using underground confined aquifers and by building new reservoirs. Instead, SW proposes energy | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regards to your comments on transparency, we remain committed to transparency and welcome constructive engagement on the options we have considered. We will continue to refine our approach based on new evidence and stakeholder input, ensuring our WRMP reflects both regulatory requirements and our responsibility to safeguard water resources for future generations.<br><br>Southern Water has produced this WRMP24 in line with the requirements set out in legislation, Defra Directions, and guidance issued by the EA, Ofwat, Natural England and Natural Resources Wales, and will continue to do so. Our plan has been developed in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years, ensuring our approach evolves to reflect new information, regulatory expectations, and consultation feedback. In rare cases, where there are unresolved issues and substantial public interest, the Secretary of State may call an inquiry or hearing.<br><br>With regards to your comment regarding the recycled water element, supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>The recycling wastewater of wastewater and its subsequent storage in Havant Thicket Reservoir was clearly highlighted in the current draft WRMP. In fact, one of the main topics that people raised in the previous consultation (Nov 22 to Feb 23) was issues around wastewater recycling. Please see for example, p.26, 32 and 42 of the September 11 – |

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| | and chemical hungry effluent recycling from which it and its owners will be able to profit very considerably over many years, from both construction and operation.<br><br>* The recycling plant will be located on an old landfill site on the coast at Broadmarsh (Havant), with piling and tunnelling putting Langstone Harbour at risk from leachate and the recycled water will be pumped up to Havant Thicket Reservoir and then 40kms to [redacted]. The current building costs are £1.2billion and spiralling. We need a radical rethink on where and how the company takes water from the environment, for example moving its abstraction points closer to the sea, and to the end users, to leave freshwater in our precious chalk streams for longer.<br><br>* SW lose 100 million litres of water every day to leaks. 19% of all the water they abstract from the environment, which customers pay to treat, is wasted through leakage in their distribution system. SW's slow programme for improvements means even by 2050 SW will still be leaking about 10% of all the water it treats, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious leakage and mains replacement programme SW will never get leakage under control. An industry leakage expert tells us if SW put the funding and priority in, SW should be striving to achieve a 70% reduction in leakage by 2050 (not the 53% target in its plan).<br><br>* In West Sussex, SW has not taken action to connect up its network and as a result SW is dismissing options because it can't get the water to where it is needed. Why is SW not connecting up the network? It is because they want to get the recycling schemes underway first.<br><br>* If the Plan goes through, the use of very expensive and energy-hungry effluent recycling schemes will effectively have been approved and SW will be able to carry on and build these schemes at great cost to its customers and the environment. There is also the potential for PW to be amalgamated with SW as there is linkage at the top ownership level. If that did happen PW customers like me would be hit by even higher bills because the cost of building and operating the scheme would be shared across both companies.<br><br>* I have no desire to drink water that contains treated effluent and nor does anyone I know, especially as our local water is of such high quality. Forcing people to take recycled water will inevitably lead to an increase in the consumption of bottled water by those who can afford it, with a consequent undesirable increase in plastic waste.<br><br>In summary, SW's professed best options are high energy, carbon and chemical hungry solutions. SW needs to do more to repair leaks, replace water mains, encourage demand reduction from households and non-household users and develop reservoirs and aquifer storage solutions. | December 4 2024 Consultation on the revised dWRMP, https://waterresources.southernwater.co.uk/wp-content/uploads/2024/09/01-WRMP-Consultation-Summary-1.pdf<br><br>Regarding the selection process, effluent recycling is included in our strategy because it has been rigorously evaluated alongside other options and found to provide a reliable, sustainable source of water that complements demand management measures, leakage reduction, and other supply solutions. Our selection of preferred options follows an evidence-based approach, balancing environmental impact, feasibility, long-term resilience, and value for customers.<br><br>Our WRMP24 builds on previous strategic assessments while incorporating new data, regulatory guidance, and extensive consultation feedback. Every potential supply and demand management option has been reassessed, including alternative sustainable solutions, to ensure that our plan delivers a resilient, cost-effective, and environmentally responsible water supply.<br><br>Sea tankering would be an expensive option, with water supply costs approximately 150 times greater than our traditional supply sources. Our WRMP no longer includes this option so there will be no environmental impacts from sea tankering. However, as part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/ We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. We recognise that carbon may be significant from this option however, due to the required transport methods and temporary nature of the option. We will continue to assess the carbon footprint of this option and balance it against the environmental benefit of protecting the River Test in times of drought.<br><br>It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>* In response to your suggestion to increase rainwater capture using underground confined aquifers and by building new reservoirs: We have assessed the option of reservoirs, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

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| | I set out below the other information from expert sources, which will no doubt already be known to you. | Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>* Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the |

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| | | tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>*In response to your suggestion that we should aim for 70% reduction in leakage: The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. Therefore, a 70% target would not be feasible based on our detailed assessments. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>* With regards to your question, 'Why are SW not connecting up the networks?': We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plants can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Regarding delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>* We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. This options appraisal includes network upgrades and interconnector schemes in central area as |

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| | Addenda<br><br>1. The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers. (For further detail refer to item A below).<br>2. SW have not completed a full review of the plan considering all alternative options as “a full re-appraisal exercise was not considered time or cost beneficial” (Annex 20, page 3). Given the importance of finding immediate solutions for the rivers Test and Itchen and at Pulborough, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. More sustainable options previously ‘parked’ by SW which work with predicted climate changes should have been more robustly assessed and included in the revised draft plan | well as in Hampshire. The regional investment modelling selects the best value combination of options.<br><br>Southern Water and Portsmouth Water are entirely separate and independent companies but have commercial arrangements to transfer water across their respective boundaries. If there are any failures, such as losses of supply to Southern Water customers then Southern Water is responsible, if the failures affect Portsmouth Water customers then Portsmouth Water is responsible. Portsmouth Water is a ‘Water Only Company’ meaning that within its area, it provides water services. Southern Water provides wastewater services in the area Portsmouth Water supplies for water. Southern Water is not discussing changes to the current licence to operate arrangements and company mergers are not considered to be part of this consultation process<br><br>* With regards to your comment about increased consumption of bottled water, we don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. Customer insight locally and nationally shows broad support for water recycling. The water at customers’ taps will continue to meet strict drinking water quality standards and be wholesome to drink. Customers do not need to be concerned about the water quality. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>1) With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>2) Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies |

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| | 3. It is clear that SW have only focused on identifying options to fill the gap as a result of the delay to recycling options in Hampshire and at Littlehampton (Annex 20, page 1 and 3) instead of seriously looking at prioritising more sustainable options.<br>4. The timescales for 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 precious and iconic chalk rivers with no solution for longer.<br>5. 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 notbe permitted beyond 2030. The plan extends their use up to 2034. (For more detail refer to item B below.)<br>6. SW should not be allowed to rely on continued use of the Candover drought option, Lower Itchen and Test drought orders, while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered as proposed (Annex 20, page 1 and 2), as it is inevitable that the Hampshire recycling scheme will be delayed further and will not be available in 2035, a more sustainable solution must be developed.<br>7. Tankering water from Norway in a drought cannot be accepted as a credible drought plan. (For more detail refer to item C below).<br>8. SW are unnecessarily pessimistic in their assumptions regarding population growth and this is driving a large demand deficit. The information provided is also contradictory with Annex 7b forecasting 23.56% growth and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible. (For more detail refer to item D below.<br><br>9. Assuming high levels of abstraction reform is over precautionary when what will be required in future is currently very uncertain as SW environmental studies are still ongoing. This is driving a large demand | have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>3) The purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard.<br><br>4) With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>5, 6) It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>7) With regard to the viability of sea tankering, our Water Resources Management Plan (WRMP) looks at our future water needs from 2025 to 2075. All our water supply options are continually appraised as part of our adaptive planning process and sea tankering is one water supply option that we considered and have now excluded it from our plan.<br><br>8) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is |

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| | deficit which helps SW justify their unsustainable effluent recycling schemes. (For more detail refer to item D below.)<br>10. Assuming no abstraction at all even in winter from the rivers Itchen and Rother is not appropriate and over precautionary. (For more detail refer to item E below.)<br><br>11. SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control.<br>An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70%reduction by 2050, rather than the 53% leakage reduction target they have set themselves by 2050.<br>11. SW have not taken account of the completion of the Hampshire Grid improvement programme which 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 within Hampshire by merging existing zones could have changed the options appraisal process. (For more detail refer to item F below.)<br><br>12. The investment model is not fit for purpose it needs to be urgently revised 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, whereas it currently favours large infrastructure schemes which should be a last resort once more sustainable options have been exhausted. (For more detail refer to items K and L below.)<br><br>13. The possibility of market trading for 'water credits' is mentioned. This is a concern as it could create a new loophole for water companies and speculative developers to exploit to make money, while not actually doing anything to fix the problems faced. | shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>9 & 10) The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>11a) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>11b) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>12) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>13) Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings. Affinity Water is investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex |

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| | 14. Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers.<br><br>15. The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. (For more detail refer to item M below.)<br>16. SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br><br>17. The process of environmental assessment and screening methodology cannot be robust if unsustainable and environmentally damaging schemes like the Hampshire effluent recycling/transfer scheme get through. The scheme that in 2022 when it was selected had the highest environmental impact score.<br>18. For more information on the key concerns and environmental impacts associated with the Hampshire effluent recycling scheme via Havant Thicket Reservoir please refer to the Key Concerns page at this link.<br>Concerning option selection<br>19. Moving the [redacted] abstraction to the tidal limit would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. This is not mentioned as an option that has been considered in the SW Technical Report, nor Annex 20.<br>20. In the future SW indicate 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. Moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows in rivers to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. (Why is the solution of moving abstractions to the lower catchment of rivers not being prioritised for investigation as a more sustainable solution across the region?)<br>21. More challenging targets must be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control. Investigation and delivery should commence in 2025 to ensure these schemes are delivered as quickly as possible, to provide at least 13.8 Ml/d to help better manage resources in the catchments and protect the rivers Test and Itchen from drought orders. We need Defra and the regulators to strongly challenge on this to ensure a quicker delivery date. (For more detail refer to item H below.)<br>22. The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. This is essential and | North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br><br>14) Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>15) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>16) A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>17) We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact.<br><br>18) Noted<br><br>19, 20) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>21) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | should be prioritised and funded urgently so that these schemes can be included as feasible options. (For more detail refer to item G below.)<br>23. Proposed schemes to recycle water currently wasted at the [redacted] and Test Surface Water WSW should be prioritised more urgently to help minimise abstraction on the Test and Itchen all the time, not only in a drought (Annex 20, page 32).<br>24. No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme. A scheme previously indicated to be feasible with sites that are closer to where the water is needed. (For more detail refer to item J below.)<br>25. Negotiations with a very large industrial water user in South Hampshire should have been brought forward as a priority, to explore alternative supply options when the contract expires in 2026, to free up drinking water for SW customers in a drought (Annex 20, page 6) and provide more certainty for the plan.<br>Could a desalination plant that trials research into alternative technology, potential uses for the hyper saline solution and reducing energy consumption be a way forward for this site (Annex 20, page 30 refers) perhaps in partnership with industry.<br>26. In West Sussex the need for network upgrades is being used as an excuse not to bring forward schemes at existing works that would increase supply (Annex 20, Appendix A). If all of these schemes rejected for this reason were brought forward, they could deliver more than 20Ml/d of water to the Central Region. This is more water than is to be provided by the proposed Littlehampton (Ford) effluent recycling scheme which will discharge to the Western Rother. The necessary network upgrades in West Sussex should form part of the plan. Network upgrades are taking place in Hampshire to address such concerns, why not in West Sussex?<br>27. Across the Western and 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 18 Ml/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.<br>28. Multiple cheaper and more sustainable schemes have been rejected by SW because they 'cannot be delivered in time' (presumably this means by 2030).<br>17 schemes in Hampshire and IOW (Western Area) could deliver at least 42 Ml/d.<br>7 schemes in West Sussex (Central Area) could deliver at least 18 Ml/d<br>Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are putting all of their 'eggs in one basket'. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades. | 22) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>23) With regard to prioritisation of recycling water at River Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. More crucially, under some of the drought conditions covered by WRMP24, it is unlikely that River Itchen WSW would be running. Therefore, this scheme would provide no supply benefit in a drought. However options to reduce process losses will be considered for WRMP29.<br><br>24) We are focussed on delivering the HWTWRP by 2033-34. The alternative option to use Fareham for recycling water has not been shelved but is put on hold.<br><br>25) We will be exploring the option of amending the bulk supply agreement with a large industrial user in HSW WRZ when the existing contract expires in 2026. However, we are not planning to consider any changes to the bulk supply agreement for WRMP24. We mention options relating to this large industrial user in Annex 20 of our fdWRMP24.<br><br>26) Network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br><br>27) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences, which typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods.<br><br>28) Notwithstanding the fact that these 17 schemes are not explicitly identified in this query, there is little benefit in developing 17 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030. |

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| | 29. SW are still not urgently investigating and bringing forward additional new reservoir schemes in the short to medium term, despite this being customers preferred choice. The delivery of the River Adur project is not scheduled until 2039/40, no other reservoir schemes are in the pipeline in Hampshire or West Sussex in the revised draft plan.<br>30. Groundwater schemes on the Isle of Wight (IOW) are not brought forward as the water gained cannot be transferred to the mainland to help the rivers Test and Itchen in a drought (Annex 20, page 5-6). However, if implemented they would reduce the amount of water that needs to be transferred from Southampton to the IOW providing a benefit that should be pursued.<br>31. The timescale for delivery of ten years should not be seen as a valid reason to reject provision of a bi-directional link between the IOW and the mainland, especially as it could allow water to be used more flexibly in a drought, including use of future spare water from Sandown.<br>32. There has been little proactive work by SW to investigate buying or trading licences with private supply users across the region. In a restricted document supporting the previous draft plan it indicated buying just one licence could deliver 19.7 Ml/d. There should be more proactive investigation and negotiation by SW to buy existing private abstraction licences, this in turn would then open up the potential for a more flexible approach to the use of licences within a catchment to meet water supply needs and environmental objectives.<br>33. Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to reduce their use of drinking water for non-potable uses. This can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions.<br>34. The free water butt scheme trialled on the IOW should be rolled out across the SW supply area to customers as a priority.<br>35. To read about a strategy for a better way forward please refer to the Water Matters page on 'A better way forward' at this link.<br>Concerning inadequate consultation with water users and affected communities<br>36. Critical documents 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. In fact there are more documents restricted in 2024, than there were in 2022. Is this a deliberate play 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. Other water companies made this information more accessible. | 29) We have looked at over 50 reservoir options as part of our options appraisal process over the last 3 WRMP cycles. These are not taken forward due to environmental concerns that will make it difficult to get planning permission. However, we review these options for each WRMP cycle and will review them again for WRMP29.<br><br>30) Our plan includes two groundwater schemes on the IOW to provide up to 3.4Ml/d by 2040.<br><br>31) The delivery time of an option is the reason for rejection only in cases where water is needed earlier than the option can be delivered. The delivery time in itself is not a reason for rejecting an option.<br><br>32) We are open to licence trading. The Sittingbourne industrial re-use scheme in our Kent area is effectively a licence trading scheme that will provide up to 8Ml/d from 2030-31 onward.<br><br>33) Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency.<br><br>34) Regarding water butts, following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>35) Noted<br><br>36) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a |

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| | 37. Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling?<br><br>38. Assurances given by SW that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met.<br><br>39. Lack of adequate and meaningful engagement /consultation with customers;<br>– A very significant alteration is taking place to customer's water supply with the source changing from river, spring or groundwater to recycled effluent. SW should be proactively engaging with all their customers to get their feedback on this material change.<br><br>– 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 the [redacted] desalination scheme was rejected, and the WRMP19 back-up option of discharging recycled effluent to the River Itchen was also 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 a full public consultation. This did not happen.<br><br>– As a result, communities in the areas affected by the selected options did nothave the opportunity to comment at the 'formative stage' of the plan, before the new effluent recycling options were selected.<br><br>– At the time of previous consultations (2020 to 2022) posters were not even placed at 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. | non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>37) We consulted extensively with our customers and stakeholder before publishing our dWRMP24 and solicited their views on the different option types. However, we have a statutory duty to maintain uninterrupted supply of water in all but the most extreme weather conditions, which may mean selecting options less preferred by customers.<br><br>38) The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We made clear in our Summer 2024 Consultation for the Hampshire Water Transfer and Water Recycling Project that water quality modelling and assessment work was ongoing and would be fully reported in our Development Consent Order application. As that work has progressed, we are now consulting on it as part of our Spring 2025 Consultation.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order application. The energy usage information used to support that will be appended to the assessment.<br><br>39) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. |

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| | 40. The consultation documents are vast, very repetitive and fail to provide important information, or make it restricted and inaccessible, making it very difficult for a lay person to understand/get through the consultation reports. Is this intentional?<br>Since this is a 'once-in-a-generation' chance to address future water needs, there needs to be a more open discussion about moving to a more sustainable approach which works with predicted climate change, not against it.<br><br>More detail on some of these concerns is set out below with page numbers provided to help find the relevant detail in the SW consultation Technical Report.<br><br>**A**<br>The SW revised draft plan does not strive to work with predicted changes to our climate, which modelling has shown means we will get wetter winters and drier summers. We need a complete re-think about how, where and when we take water from the environment. We need a strategy that includes; Moving abstractions (river and boreholes) to the bottom of the catchments, collecting more water in winter and storing it for use in dry summers. This would reduce environmental impacts and allow the extent to which abstraction reform is required to be reduced.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 chemical, energy and carbon hungry infrastructure (effluent recycling and desalination), which must operate 24 hours a day, 365 days a year, even though it is intended as a drought resource. Constructing large pipelines to transfer the water long distances (40+km), because the water is not being manufactured 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 invest in infrastructure heavy unsustainable solutions, which once selected will stop the Company investigating and bringing forward more sustainable solutions for another generation.<br>**We agree urgent action is needed now to invest to create more robust and resilient water supplies, but what is needed are more sustainable solutions that work with climate change, not against it.**<br>• Moving river and borehole abstractions down catchment to protect the environment and restore more natural flows. | MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>40) We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan<br><br>Our past performance has not met the expectations of our customers, stakeholders or indeed ourselves. As a result, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | • Developing new reservoirs and aquifer storage schemes enable more winter water to be stored for use in dry summers.<br>SW say this is a once in a generation opportunity to develop more resilient supplies, but we need to take action now to make the right decisions to invest in more sustainable solutions that leave a long-term and positive legacy, not chose unsustainable solutions to manufacture water, which SW see as a quick fix and which makes them a profit, but future generations will regret as they will last no more than 60 years!<br><br>***B***<br>The SW **proposal to continue to rely on and extend the use of the Candover Drought Option (augmentation boreholes) and drought permits (page 138-139) should not be permitted beyond 2030.** Instead SW should be required to move the [redacted] river abstraction to the tidal limit to allow natural flow to be restored in the freshwater catchment during a drought, bring forward their groundwater borehole schemes in Hampshire sooner, plus actively investigate and bring forward additional aquifer storage options. **SW should not be allowed to continue to use these 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**. Having failed to understand the risks of the [redacted] 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 new technology 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.<br><br>***C***<br>It is unbelievable that in Hampshire **SW now propose to tanker water from Norway in a drought** instead of proactively investigating more sustainable solutions such as moving the [redacted] abstraction on the River Itchen to the tidal limit, or capturing more winter rain and storing it for dry summers. Tankering 45 Ml/d is equivalent to moving 18 Olympic size swimming pools of water every day. On page 136 of their revised draft plan SW acknowledge "considerable risks and uncertainties remain, especially around water quality and our ability to mitigate the identified environmental impacts linked to both tankering and transferring water from the port (*Southampton*) to Test WSW site via temporary pipeline". On page 31 SW confirmed; "The Board acknowledges that the **implementation of bulk import by sea tankers presents a number of deliverability challenges (which had previously resulted in it being rejected)".** A solution the GMB union (who represent water industry workers) described as "farcical and ridiculous", noting that; "The UK uses just a tiny amount of the rain that falls from our skies. Private water companies have utterly failed to invest in the infrastructure needed to capture more and reduce the need for farcical plans like this".**Tankering water from Norway cannot be accepted as a credible plan.** The cost to customers will be enormous, including fixed annual costs and reservation charges even when the water is not required (Annex 20, Page 11). The environmental impact will be huge, in addition to the massive energy and carbon impacts, the temporary pipe would be placed "along the banks of the River Test" (Annex 20, Page 9). It is hard to believe that private landowners along the river will give their consent. | B<br>WRSE modelling has demonstrated that, without the use of drought options in Hampshire beyond 2030, there are unresolved supply demand deficits. This makes a WRMP non-compliant so the extended use of these drought options is regrettable but, ultimately, essential. We discuss scheme delays in more detail in Annex 4 of our SoR in response to the EA point R1.1.<br><br>C<br>We have listened to the consultation feedback and no longer include sea tankering from Norway in our plan. This is primarily for environmental reasons. We explain this in more detail in our main fdWRMP as well as in relevant annexes such as fdWRMP24 Annex 20. |

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| | There is a risk of importing non-native species to the River Test catchment when the water is stored at existing lakes alongside the river, or if the temporary transfer pipe from the port leaks or bursts. There are water quality issues as the water 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 will be the impact on fish and the wider river ecology?**<br><br>***D***<br>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;**t**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) population growth, the figures which most closely aligns with the core strategy in the Ofwat guidance (page 118).<br>***Note:*** *The information provided on population growth is also contradictory with the Technical Report indicating a growth forecast of 23% by 2025 is used and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible?*<br>I. 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.<br>II. Assuming there will be no abstraction at all on the Rivers Itchen and 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 <u>all</u> 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 <u>beyond</u> the required reductions just to meet flow targets**".<br>III. Used 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).<br>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 more sustainable solutions to meet immediate needs in the interim. More pessimistic forecasts should only be used when they become more certain.<br>***Note:*** *Ofwat previously indicated that effluent recycling at the smaller volumes originally proposed by SW was not cost effective. By driving up the forecast demand SW are trying to justify a greater need and thus a requirement for a larger plant. The costs then go up and perversely SW make this very expensive infrastructure more acceptable to Ofwat (the water industry financial regulator).* | D<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwelling occupancy, population in commercial properties and business counts. Following the publication of the latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered for each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>If the 23% growth that you mentioned in our draft plan is from table 5.2 then that is one of a number of scenarios we have considered for net growth from 2025 to 2075. A growth value of this size is credible and is not inconsistent with the Annex 14 estimate of a 17% increase between 2025 and 2050.<br><br>Our fdWRMP24 has considered numerous scenarios relating to different rates of population increase, climate change and environmentally driven changes to the use of our existing |

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| | ***E***<br>Assuming no abstraction at all from the Rivers Itchen and Rother (page 107) is not appropriate and makes no sense.<br>• **Water can be abstracted in winter with no significant adverse impact**, and abstraction can help to reduce flood risk.<br>• The **abstraction can be moved to the tidal limit to protect the whole of the freshwater catchment**, while complying with Water Framework Directive Guidance for transitional waters (estuaries). This would be extremely beneficial in a drought, restoring the natural freshwater flow of the river for the benefit of the ecology and geomorphology. This would require minimal new infrastructure compared to the high infrastructure solutions being proposed by SW and would be much cheaper for customers. however, this is not mentioned as an option in the Technical Report which supports the revised draft plan, nor in Annex 20 (Appendix A).<br>*Note: If initially the current [redacted] 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.*<br><br>***F***<br>Despite there being an ongoing **Hampshire Grid scheme** which will improve connectivity of the SW distribution network in Hampshire which was due to be delivered in 2028, SW have **chosen to ignore these improvements** and they have not reviewed or merged the boundaries of water supply zones in Hampshire for the revised draft plan period 2025 to 2050. SW have indicated they will not do this until they develop the 2029 WRMP (page 35), so **the benefit of recently funded improvement programmes are <u>not</u> being taken into account in the current draft plan**. As the Company option review and selection process is based on individual supply zones (page 118 and 132 confirm) including assessing whether there are sufficient options in each zone, and whether there is sufficient connectivity?**, this may be adversely impacting the decisions being made for the Hampshire Zones**, **the volumes of water needed under different scenarios and the options being considered.** The fact that zones are still broken down in Hampshire and assessed individually is likely to have disadvantaged more sustainable option selection. **Taking into account the ongoing development of the Hampshire Grid could have changed the options appraisal process**.<br><br>***G***<br>SW state on page 131 that the location of Aquifer Storage Recharge (ASR) options would be limited to locations with suitable geology. This is true for where the storage would actually take place, but rather implies SW may have been dismissive of these more sustainable options for this reason. There is no recognition that if the new 'Hampshire Grid' is operational (as it will be soon due to the ongoing improvement programme), and you take into account that water can be transferred into the SW Hampshire supply area through the Portsmouth Water network, | abstractions. Because our plan is an adaptive plan (as described in section 5.5 of our fdWRMP24) it means that when actual changes to population of abstraction licences are more certain, our plan can take a different pathway. This provides flexibility. Whilst you are encouraging the use of more moderate predictions of population growth and abstraction reform there are other stakeholders asking us to go further and faster. Our fdWRMP24 strikes the balance between being ambitious and not developing more schemes more quickly than is likely to actually be required.<br><br>E<br>On page 107 of the WRMP24 we consulted on in 2024 we said "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."<br><br>What we are describing here is an 'alternative' scenario that we have considered. This is not our preferred plan.<br><br>On the point about moving abstraction points - We have considered moving our abstractions on the River Itchen further downstream. As part of our 2009 and 2019 plans (WRMP09 and WRMP19), we considered its relocation to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We also considered moving the abstraction point downstream, close to the tidal limit and pumping the water to Portsmouth Water's water supply works on the River Itchen. This would have |

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| | this **allows excess water to be collected in winter and stored in <u>any</u> suitable confined aquifers across almost anywhere in Hampshire and West Sussex**, where SW have large supply shortfalls in a drought. SW have previously identified a number of aquifers across this area (including on the IOW) with the potential for aquifer storage, but not progressed them to the investigation stage, instead they 'parked' them for further consideration in 2029, wasting a further five years, when such schemes could play a key part in meeting short and medium term needs. This is an example of where **there has not been the will to properly investigate more sustainable options**, and where the decision not to rezone Hampshire for this latest revised draft WRMP assessment could have had a significant adverse effect on the option selection process. **If a number of aquifer storage schemes were developed, each with a relatively small yield, this could make a significant difference to provide sustainable water sources in a drought,** especially in the western area. Tests in Dorset have previously shown that aquifer storage and recovery is feasible in confined sections of the chalk.<br><br>***H***<br>We are pleased to note on page 25 (Technical Report and Annex 20 pages 5 and 6) that some **groundwater schemes have been brought forward** as the local community had advocated since 2022 including;<br>• Drilling new boreholes at Romsey to provide 4.8 Ml/d by 2030-31;<br>• Removing constraints at Kings Sombourne groundwater source to provide additional 2.5 Ml/d from 2030-31;<br>• Implementing Test Managed Aquifer Recharge scheme to provide up to 5.5 Ml/d from 2035-36.<br>However, given the very limited infrastructure required (see pages 164-165 and 169) regulators **need to challenge why these new water resources cannot be brought on line sooner** to provide 13.8 Ml/d to help better manage resources in the catchments and protect the Rivers Test and Itchen from drought orders.<br>While some environmental studies and trials will be needed a previous SW estimate for developing the Test MAR scheme was six years including the trials. The initial assessment was also that the yield could potentially be significantly higher. Two years have already been wasted. If work started immediately this drought resource could potentially be available by 2030. **A more challenging target should be set for delivery of these schemes,** especially as these options are completely within SW control and not dependent on other water company input.<br>The option to recommission Chilbolton near Andover was rejected as it only provides a small benefit (0.5 Ml/d) to one zone, but not the Test or Itchen (Annex 20, page 5). **SW need to investigate if there is an option to better connect zones to enable this resource to be utilised** as part of the Hampshire Grid project?<br><br>***I***<br>SW indicate that they have used costs (CAPEX and OPEX) from 2021 (page 134/135). For the Hampshire effluent recycling scheme the costs have spiralled since 2021, CAPEX and OPEX costs have gone up considerably since the Gate submission. The costs developed in 2020-21 | required a significant increase in the treatment capacity of Portsmouth Water's water supply works. This option was not taken forward due the potential impacts of a large abstraction on the River Itchen's downstream ecosystems. We will reconsider this for WRMP29.<br><br>F<br>The WRSE modelling that underpins this WRMP and those of other companies in the region accounts for the Hampshire Grid. Therefore the options appraisal also accounted for this. On the point about zones, it is not appropriate to alter the water resource zones used in our WRMP24 until the grid scheme is complete. This explains why this needs to be considered in the WRMP29 rather than the WRMP24.<br><br>G<br>Appendix C of Annex 20 to our fdWRMP24 describes ASR and MAR options in more detail.<br><br>H<br>Even if new sources require a limited amount of infrastructure there are still regulatory and other processes to complete before new sources can be delivered and made operational. For example, any potential changes to abstraction require approval from the EA and, on some occasions, Natural England. Also all new sources need to meet the strict requirements of the DWI. |

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| | are definitely out of date as costs have spiralled to a minimum of £1.2 billion. **If the best value assessment of the option is based on 2021 costs it will be flawed**.<br>• If the true costs of the effluent recycling scheme via Havant Thicket Reservoir were known in 2021/22 would the scheme have been selected as best value?<br>• In the light of the known minimum £1.2 billion price tag has the schemes selection been robustly reviewed? Regulators need to look at this carefully.<br>Reference is made on page 138 to additional costs included of £96.8 million for new treatment (ceramic membrane filtration system) at [redacted] to treat the recycled water.<br>– **What additional treatment will be needed at Farlington WTW before supply of recycled water to Portsmouth Water customers, and has that been included in the costings?**<br><br>***J***<br>No work is taking place to ensure the alternative effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced, even though SW received Ofwat funding to progress investigations. Page 137 confirms; "Earliest delivery delayed from 2030-31 to 2037-38 to allow additional time in case the preferred option cannot be progressed". **There is a concern that SW are manipulating the situation to ensure that at the Development Consent Order application stage for the Hampshire effluent recycling/ transfer scheme the Company will be able to argue there is no viable alternative available, in the timescales needed** to meet the Company commitment to EA and NE for abstraction reductions on the Rivers Test and Itchen. Hoping that this will push the scheme through despite their being likely significant environmental effects. When effluent recycling from [redacted] WWTW could provide a source closer to where the water is needed, which is cheaper to operate and potentially has less environmental impacts.<br><br>***K***<br>SW indicate on Page 148; " When making a decision about inclusion of an option, the Investment Model (IVM) used looks to see if it is economic to defer investment until after 2030 and only includes investment in the 2025-30 period if it is economic to do so once all the futures after the 2030 and 2035 branch points are considered". This sounds like SW are deliberately manipulating the model to prevent the selection of smaller more sustainable schemes until after 2030, **in favour of continued use of drought permits on the Test and Itchen, and the selection of larger schemes which cannot be delivered until later, to make sure the Company get the solution they want selected, which delivers more guaranteed profits.** This is not acceptable we need the model to freely select and bring forward the development of smaller more sustainable local solutions now. If that pushes back the delivery timescale for when effluent recycling is needed that is a good thing, as it allows time for advances i more sustainable technology for effluent recycling and desalination to be developed. *Note: A report commissioned by SW indicated that the development of nanotechnology could be a game changer for the viability of desalination in the near future* The Investment Model used prioritises continuing abstraction from rivers in a drought (options/ permits) over other solutions as that is cheaper, even when other options are available (page 154). **The criteria the investment model is using are clearly flawed**, relying on manual interventions to force | As mentioned earlier our WRMP and the WRSE regional modelling accounts for the future delivery of the Hampshire Grid.<br><br>I<br>The costs used in the WRSE investment model have a consistent cost base as set out in the WRMP guidelines produced by our regulators. It would be in appropriate to update costs for one option in isolation. The crucial point is that a comparable cost base be used across the whole region. This is how the WRSE modelling has been carried out.<br><br>The costs associated with treating recycled water have been accounted for in the costings used in the WRSE modelling.<br><br>J<br><br>The Water for Life Hampshire programme is progressing in line with the gated process set out by RAPID. This RAPID process contains numerous phases on public consultation and the options selected are those that score highest on the strict criteria used, which includes environmental impacts. All the RAPID submitted documents for gate 1, 2 and 3 along with the query responses are here: Water For Life – Hampshire Technical Documents |

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| | more appropriate option selection in the early years of the plan, when SW chose to do so. This is likely to be one of the reasons why other more sustainable options have not been selected in the past. **The regulators need to scrutinise the modelling carefully to ensure that sustainable solutions are not held back.** The model should have been updated as a priority before the plan was revised, not after. Additional more sustainable options that have previously been 'parked' by SW and may not even make it to the investment modelling stage as potentially feasible options also need to be brought forward so that they can be selected for investigation. For example, moving abstractions to the tidal limit and aquifer storage options. **If they are not selected in the plan they will never get funded to assess the yield they could provide. This then becomes a 'negative loop' where they cannot be selected because SW say they don't know what yield they could deliver.** Without funding for investigation SW will continue to make the same excuses for not selecting these options in 2029. Without selection in the this plan the necessary investigations will not be funded.<br><br>***M***<br>**Effluent recycling via Havant Thicket and transfer (40+km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions.** Page 251 confirms that the individual scheme with the largest greenhouse gas impact is the bulk import from Havant Thicket Reservoir to [redacted]. SW estimate that emissions will be 898 ktCO2e (Figure 10.1), **more than double that of any other transfer or desalination scheme**. It is not even clear if that figure includes the emissions from the effluent treatment process. Page 252 acknowledges**; "**The water sector accounts for nearly 1% of UK greenhouse gas emissions and has an important role to play in tackling these ahead of the UK's 2050 target". Stating SW are; "Ensuring carbon is a key focus by instilling carbon conscious decision-making and processes into the Southern Water culture" If that were the case how is effluent recycling selected? SW have committed to being net zero carbon by 2030, yet this energy and carbon hungry scheme is selected for 2035. **There is no indication that SW are striving to plan in a sustainable way when this plan selects the highest carbon and green house gas emission options in the short term (tankering from Norway) and in the medium to long-term effluent recycling via Havant Thicket Reservoir with a 40+km transfer pipeline to [redacted], and later 32+km pipeline into West Sussex.ttSouthern Water Consultation Library document linkst**The Southern Water documents run to **32 volumes** of detailed content with **156Mb of downloadable files**. Other 'restricted' documents, including their Options Appraisal, Option Fact Files and key appendices from their environmental assessments have **not** been published by Southern Water. tThe full set of publicly available Southern Water consultation documents can be found in the following 32 volumes. | K<br>The IVM used by Southern Water and the other WRSE companies (who have now had Defra approval to finalise their WRMP24) is run in a way that aligns with the WRMP guidance set by our regulators. The model, its criteria and the way it is used are robust and have been subject to assurance. However, as mentioned earlier drought options in Hampshire are essential after 2030 in order to prevent unresolved deficits.<br><br>M<br><br>We have responded to the points relating to greenhouse gases earlier. For example, you can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/ |

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| WRMP49 | I am really concerned about the proposal to store treated sewerage in the proposed reservoir. This was not the original proposal, one that I could get behind. As soon as it was agreed then this latest proposal was put forward. I think it is a terrible idea. To sell this as a nature reserve is dishonest. Treated sewerage still contains hormones and pharmaceutical s in the water as well as other toxins.<br>If you need additional water why do you not divert the lavant as it flows through Finchdean and Rowlands Castle. Thousands of gallons of water comes off the downs travels through the ford and floods local land.<br>Maybe consider collecting this instead | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>To clarify, the water stored in the proposed reservoir would meet stringent regulatory standards for water quality. Advanced treatment technologies are capable of removing a wide range of substances, including pharmaceuticals and hormones, ensuring that any water introduced into the reservoir is safe and suitable for further treatment before entering supply. The use of treated wastewater recycling is a proven and sustainable method already in operation in other parts of the world, helping to secure resilient water supplies while reducing pressure on natural sources. Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>In response to your comment that the effluent recycling was not in the original proposal, the WRMP process involves the re-drafting of the WRMP in response to stakeholder and public feedback. Therefore, it goes through several iterations and the most appropriate solutions assessed and chosen.<br><br>Regarding the Lavant, we have explored a wide range of potential water sources, including surface water abstraction, and continue to assess all viable options. However, diverting the Lavant is not a feasible alternative due to its highly seasonal nature, with periods of high flow in winter but little to no flow in summer when demand is highest. Additionally, environmental regulations protect natural watercourses from excessive abstraction to safeguard biodiversity and local ecosystems.<br><br>We recognise the importance of transparency in communicating our proposals and will continue to engage with local communities to address concerns, share evidence, and ensure the best possible solutions for long-term water resilience. We welcome further dialogue and feedback as we refine our plans. |
| WRMP50 | I am shocked and saddened by Southern Water's renewed plans for Havant Thicket Reservoir.<br><br>I am concerned for my environment, the people in this area and I am angry at the betrayal that what was supposed to be an attractive amenity will now be sullied and spoilt.<br><br>I object in the strongest terms to this ill conceived and poorly thought out plan.<br><br>Please will you ensure that Southern Water stop this and are advised by you not to bother resubmitting another similar proposal.<br><br>Thank you for your attention in this matter. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We understand the strength of feeling in your response and appreciate the opportunity to clarify our position on the Havant Thicket Reservoir proposals.<br>The reservoir remains a vital part of securing long-term water resilience in the South East, an area facing increasing pressures on water supply due to population growth and climate change. We recognise that expectations around its purpose and design have evolved, and we are committed to ensuring that it remains an asset to the local community as well as a sustainable water resource.<br><br>The reservoir will still provide an attractive amenity, with plans for extensive landscaping, biodiversity enhancement, and recreational opportunities. The introduction of treated |

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| | | wastewater recycling into the reservoir has been carefully considered based on extensive research and environmental assessment. The water will meet strict regulatory standards, ensuring it is safe for both public use and the surrounding ecosystem. This approach is already used successfully in other regions globally to enhance water security while minimising the need for additional abstraction from sensitive natural sources.<br>We acknowledge your concerns and are committed to ongoing engagement with the community to address them transparently. However, securing sustainable water supplies remains a key responsibility, and we must explore all viable solutions to meet future demand. The proposals will continue to be subject to rigorous scrutiny by regulators, and we will ensure that all feedback is carefully considered in shaping the final plan.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. |
| WRMP51 | Submission to Defra regarding the Southern Water development plans<br><br>As a customer of Southern Water and concerned citizen I am compelled to write to express my summary of your business and ethical conundrum – and to offer a perspective for your consideration.<br>The situation: Southern Water must supply water to a rapidly increasing population in southern England. Southern Water has an obligation to its shareholders to make a profit. It must also operate within constraints dictated by national government; these constraints encourage the building of infrastructure as it is upon such initiatives that profits can most readily be made.<br>The difficult question: On the one hand, and in the short term (the next decade) it is rational for Southern Water to propose effluent recycling as a major component of its planning (while largely ignoring such issues as leakage reduction) as it assures:<br>i) Supply to customers<br>ii) Profitability<br>iii) Adherence to nationally imposed constraints.<br>On the other hand, such an expensive, energy intensive, greenhouse gas emitting, short-term "business as usual" proposal will contribute to the extinction of human civilization over the next 50 years. Doubtless this last statement will raise your hackles, but it is correct. A few of the current rich may survive if our world continues on its current trajectory, but not in the comfortable world we enjoy today. The facts are on the table.<br>Resolving this dilemma: Southern Water surely agrees that we should always maintain hope for the future of humankind and act accordingly. A longer-term solution must be found if Southern Water is to emerge as a responsible player in this remarkable world. Solutions have been offered by many parties with the simplest being the building of a further two reservoirs and reliance on the expected higher winter rainfall due to our changing climate. Southern Water is at a crossroads - it can either fall into the trap it is proposing or show prudent leadership. Over to you, Defra and Southern Water – please be Aware, think Big and Care – the ABC of good management. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Thank you for sharing your perspective on the challenges facing water supply in the South East and the broader ethical considerations of long-term sustainability. We fully acknowledge the scale of responsibility we hold in securing water resilience for future generations while minimising environmental impacts.<br><br>Southern Water must supply water to a rapidly increasing population in southern England. In addressing this, our approach is not driven purely by short-term considerations but by a legally required, evidence-based assessment of all available options. Our Water Resources Management Plan (WRMP) takes a long-term view, balancing supply and demand while incorporating a range of solutions, including leakage reduction, demand management, and new supply infrastructure.<br><br>On the question of additional reservoirs, we are working closely with Water Resources South East (WRSE) and other regional water companies to explore a wide range of solutions. Reservoirs play an important role in our long-term plans, but they require significant land, long lead times, and careful environmental assessment. Meanwhile, the impact of climate change is highly uncertain—while some models predict increased winter rainfall, others indicate more prolonged droughts, meaning reliance on seasonal storage alone is a high-risk strategy. A diversified approach, rather than reliance on a single solution, is essential to ensuring a secure supply.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment, supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>We are planning to build two reservoirs: the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision |

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| | | for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We appreciate your call for prudent leadership. Southern Water remains committed to a balanced, evidence-led approach that ensures a sustainable and reliable water supply while minimising environmental harm. We welcome continued engagement and dialogue as we work towards solutions that benefit both present and future generations. Thank you again for taking the time to share your views. |
| WRMP52 | I have serious concerns about pumping recycled effluent water and adding it (without planning permission) to the raw water, which is planned for and approved to fill the new reservoir under construction in Havant Thicket.<br><br>19% of treated drinking water is lost due to leaks. Southern Water should prioritise repairs to the infrastructure to reduce leaks far more quickly than currently planned.<br><br>Southern Water's scheme is costly and environmentally damaging.<br><br>Capture of rainwater should be a priority with additional reservoirs. Also aquifers can be refilled to help store water until it is needed.<br><br>There are sure to be many more less damaging and more cost effective ways of securing our water supply into the future. Please consider putting together several/many sustainable water schemes rather than accept what Southern Water is proposing. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>In response to your concern regarding planning permission, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>With regards to water storage and your suggestion of additional reservoirs, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Regarding your suggestion of water storage in aquifers: A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>At a household level, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water |

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| | | butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community-level initiatives. Based on typical rainfall in the UK, by fitting a water butt to your gutter and downpipe, you could save up to 24,000 litres of water a year – which is one reason that our business customers are able to claim a free water butt from us: https://www.southernwater.co.uk/save-a-little-water/saving-water-in-your-business/water-butts-scheme/. |
| WRMP53 | I object to the proposed scheme to send treated sewage to Havant Thicket Reservoir.<br>I understand the need to treat all sewage rather than discharging it to the sea but if there are government restrictions on how infrastructure investment is funded and raised and spent then this needs to be relaxed to ensure all the water treatment companies focus on their responsibility to the environment on behalf of their customers.<br><br>In addition, originally Portsmouth Water were keen to encourage the use of Havant Thicket Reservoir for recreational use, as is all other UK reservoirs.<br><br>At around the same time as the Southern Water sewage recycling scheme was introduced the recreational use of the reservoir was dramatically decreased. I believe the two are linked and once the threat of deliberate sewage contamination as been removed then recreational use of the reservoir can return.<br><br>The stated reason for restricting recreational use of the reservoir by Portsmouth Water was the risk of water level changes. This risk is completely imaginary as the vast majority of recreational users of the enitre Solent seem to manage perfectly well with the five metre change in water level, every 6 hours. I severely doubt that there exist on this planet human constructed water pumps that could achieve the same effect on a body of water the size of Havant Thicket Reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of the reservoir. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Thank you for sharing your concerns regarding the recreational use of Havant Thicket Reservoir and its relationship to the water recycling proposals. We would like to clarify that there is no link between the introduction of treated wastewater recycling and any changes to the planned recreational use of the reservoir. The reservoir has been designed to provide both a secure water supply and a valuable public amenity, and we remain committed to ensuring it benefits both the environment and the local community.<br><br>The decision by Portsmouth Water to limit recreational activities is based on safety considerations, particularly the potential for fluctuating water levels. Unlike tidal environments such as the Solent, where water movement is predictable and gradual, reservoir water levels can vary significantly over time due to operational requirements. The management of water levels is dictated by multiple factors, including drought conditions, supply needs, and environmental regulations, and cannot be compared to tidal fluctuations.<br><br>We understand that recreational access is important to the community, and we are working closely with Portsmouth Water to ensure that public access is provided wherever it is safe and appropriate to do so. We remain committed to engaging with stakeholders to balance water security, environmental protection, and community benefits in the best way possible.<br><br>Thank you for taking the time to share your views. |
| WRMP54 | I live in Rowlands Castle where the Havant Thicket Reservoir is currently under construction.<br>I am in favour of this but have become concerned about other issues.<br>We live in a country which is often very wet in the winter and recently and, more importantly, projected to be drier in the summer due to climate change.<br>I have read the Havant Matters - Water Matters publication and have a few comments I would like to make.<br>Firstly I do not pretend that I understand about the "Hampshire Grid Project" but I would say that transferring water via pipelines from one area to another is complete madness when smaller | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>We note your objection to the Hampshire grid improvement scheme. |

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| | storage areas, reservoirs/lakes or aquafers near the places where water is required would surely be a more acceptable idea.<br>Positioning some of these storage areas at the mouth of our rivers before they discharge to the sea would be a better solution.<br>Tankering in water from Norway would be absolutely stupid both ecologically and environmentally and also at huge cost. We do have copious amounts of "free" water each winter - we are just not storing it properly.<br>A lot of water is wasted through leakage from old supply lines and it would probably be more cost effective to repair these leaks which account for a huge amount of wasted water.<br>Lastly - when planning new estates what about having two water supplies to each new house - one for drinking water and one, non potable, for watering the garden or cleaning the car etc. Obviously I have no idea whether or not this would be possible but it might help the situation in the long term.<br>Please read the Water Matters publication as it contains some sensible ideas and suggestions and also some real concerns. | Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, at the individual customer level. This would also require the entire housing stock across our supply area to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |
| WRMP55 | To whom it may concern,<br><br>I am writing to object against the use of the new reservoir for recycled sewage to be mixed with the most beautiful water from the South Downs.<br><br>Some of the reasons being:<br>There seems to be huge concern about the environmental impact of the effluent recycling scheme, including significant impacts associated with the concentrated reject water discharge to the Solent.<br>Greener and cheaper alternatives are not being properly investigated & brought forward.<br><br>This seems to not be a sustainable solution, especially building it more than 40km from where the recycled water is needed. The treatment & energy costs to transport the water 365 days a year will be huge.<br><br>Energy security is already a significant concern, developing energy intensive solutions makes things worse for energy security and the planet.<br><br>Very expensive solution which is not supported by customers, minimum £1.2 billion, with costs spiralling, making it very hard to believe that it will provide ‘best value’ for customers.<br><br>Totally inadequate public consultation on the alternative options and consumer acceptability.<br>You could build 3 reservoirs to store winter rainfall for the cost of this effluent recycling scheme. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding environmental concerns, we acknowledge the importance of ensuring that any potential impact from concentrated reject water discharge into the Solent is assessed and mitigated appropriately. Our regulatory approvals include scrutiny of environmental effects, and we are working with relevant authorities to ensure compliance with environmental protections. |

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| | It risks turning people away from tap water due to the lack of trust in the water companies, creating a new used plastic water bottle mountain, especially as mixed reservoir water will taste different to spring water. This will definitely be the case for our household.<br>Loss of a unique biodiversity opportunity to create a chalk spring fed reservoir. The impacts on reservoir water quality and biodiversity are still unknown.<br><br>Significant additional risk of pollution from the recycling plant, especially if it is not maintained properly by Southern Water. No independent monitoring of the discharge into the reservoir is planned.<br>This means a breakdown of trust in both Southern Water and Portsmouth Water.<br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Without a more ambitious mains replacement programme they will never get leakage under control.<br><br>I hope that you will reconsider this approach and will look into finding more sustainable natural solutions, using the pure South Downs water without mixing this with recycled sewage.<br>Thank you for your consideration and time. | On the matter of energy security, we are committed to managing our energy use responsibly. We recognise that energy-intensive solutions can have wider implications, and we are incorporating energy efficiency measures as part of our investment plans. Our Net Zero Plan outlines actions to mitigate greenhouse gas emissions associated with our WRMP24 strategy.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We understand concerns regarding alternative options. Our Water Resources Management Plan is developed through an options appraisal process to evaluate all feasible solutions. Reservoirs are part of our long-term strategy. We are currently developing two new reservoirs, Havant Thicket Reservoir and SESRO, with an additional potential site under consideration. Alternative options are continually reassessed in successive WRMP cycles.<br><br>We have undertaken an extensive consultation process to ensure transparency. Our consultation engagement with customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing our documents online, we arranged eight roadshows across our supply area in October-November, where Southern Water staff were available to answer questions. We also hosted five area-specific webinars and publicised the consultation through press releases, social media, and direct communications with MPs, stakeholders, and previous respondents. We have received 1,176 responses as part of the rdWRMP24 consultation process.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP56 | Dear Sir,<br><br>I wish to express my disquiet at Southern Water's proposals to send treated sewage to Havant's reservoir.<br><br>We were sold the plan for the reservoir as an amenity for the local area. It was to fill naturally with our ready supplies of clean spring water and rain water. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Your objection to the use of recycled water in Havant Thicket is noted. Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but also needs to consider projections up to 2075. This includes understanding changes to our water supply needs and the impacts of climate change and population growth. Additionally, all water company Water Resource Management Plans must now leave more water in the environment |

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| | Southern Water's proposal was added later. Southern Water has a poor reputation with regular discharges of raw sewage. I have no confidence that their future performance will improve.<br><br>I do not think that the reservoir would need 'topping up' with treated sewage water.<br><br>An episode of raw sewage entering the reservoir, which on past performance I am not convinced would not occur, would taint it forever.<br><br>Even if such an event did not happen worry over water quality could lead to bottled water being purchased with an increase in plastic pollution.<br><br>I can think of no positives to the Water Resources Management Plan. Scrap it now.<br><br>Yours faithfully | for the benefit of plants and wildlife. This means that water companies must explore alternative supply and storage options, including water recycling.<br><br>The HWTWRP scheme employs global best practices, incorporating a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket Reservoir. The treatment plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if any parameters move outside treatable limits. No untreated wastewater will enter Havant Thicket Reservoir. All drinking water sources are subject to the same stringent quality checks and requirements enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket Reservoir.<br><br>Customer insight locally and nationally indicates broad support for water recycling. We do not expect customers to turn to bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and remains significantly more cost-effective.<br><br>We appreciate your feedback and continued engagement in this discussion. |
| WRMP57 | Dear Sirs,<br><br>I have only just become aware of the intention of Southern Water to discharge volumes of partially processed effluent into the new reservoir being developed at Havant Thicket.<br><br>I must add my name to the list of people strongly opposed to this.<br><br>Aside from the fact that water from the reservoir will be used for public consumption, from plans that have been circulated to local residents regarding additional uses of the reservoir site, it seems the site will also be available for public leisure - walking, and water activities. So if people will be able to use the water for certain leisure activities then surely it must not be allowed for any effluent of any concentration to be pumped into the reservoir, let alone for any of that partially treated product to be allowed to find its way into the supply that will be used by households.<br><br>Please ensure my objection is registered, along with others that I am sure will lodge, and refuse to allow Southern Water to implement these proposals.<br><br>Thanks and regards, | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket is noted.<br><br>We understand concerns regarding the use of Havant Thicket reservoir for both public consumption and leisure activities. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) adheres to global best practices with a multi-barrier approach and continuous monitoring to ensure exceptional water quality when transferred to the reservoir. The plant will rigorously monitor the quality of treated effluent from Portsmouth Harbour Water Treatment Works (WTW) and will automatically shut down if parameters move outside of treatable limits. No untreated wastewater will enter Havant Thicket reservoir. Furthermore, all drinking water sources are subject to stringent quality checks and requirements enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. These measures are in place to maintain the highest standards of water safety for both public consumption and recreational use.<br><br>Regarding leisure activities at the reservoir, the water recycling proposals are not expected to impact planned public uses such as walking and water activities.<br><br>Additionally, customer insight studies conducted locally and nationally indicate broad support for water recycling. We do not anticipate that the introduction of purified recycled water will result in customers choosing bottled water over tap water. Our treated water meets strict UK water standards and is significantly more cost-effective compared to bottled alternatives. |

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| | | Thank you again for your feedback. We appreciate the opportunity to address your concerns and provide further clarity on the measures in place to ensure water safety and quality. |
| WRMP58 | Dear Sir/Madam<br><br>I very strongly object to the Havant Thicket WT&WR proposal. I have no problem with the existing Havant Thicket project, filling with natural spring water.<br>I spent over 35 years in the water industry, developing technologies and practices for water system management and leakage control. This involved speaking at conferences around the world, giving me extension knowledge of water company operations in various countries.<br><br>I have copied in my local MP because I view this issue as very important.<br><br>1. Summary of Project Outcomes<br>a. It will mean even more sewage flowing into the sea. There is already a substantial local sewage outflow problem, correctly objected to by many residents. (See 3 below).<br>b. It is carbon and energy hungry. (See 3 below).<br>c. Enormous project cost plus ongoing operational costs. Ultimately customers will pay. (See 4 below).<br>d. This project is a stop gap measure which suits the financial objectives of the water company's owners! It will ultimately mean very much higher expenditure in the long term as it is not addressing a core problem of mains replacements and leakage. (See 5 below).<br>e. Multiple alternative solutions exist. These are much better for customers in terms of costs and water quality, will cause less disruption and be much better for the environment. (See 5 below).<br><br>1. Background<br>a. Currently about 50% of spring water from the South Downs naturally flows into the sea. This will supply water into the Havant Thicket Reservoir.<br>b. The shortage of water is in the Southampton area with current over extraction from rivers Test and Itchen.<br>c. Southern Water proposes to add recycled sewage into Havant Thicket Reservoir.<br>d. Portsmouth Water customers have high-quality natural water. They are accustomed to drinking it and feel strongly that they do not have to accept Southern Water adding recycled sewage into their supply.<br><br>2. Environmental Impact<br>a. New treatment plant will be built on a landfill site at Havant. It will operate using reverse osmosis which is very energy intensive. Operating the plant will have huge environmental impact.<br>b. New plant will pump rejected effluent into Langstone Harbour and The Solent, where there is already a major problem with sewage discharges via CSO's (Combined Sewage Overflows). This rejected effluent has much more concentrated contaminants than the sewage via CSO's. Thus the pollution will affect people and marine life. | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket is noted.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We |

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| | c. Three new pipelines to be built, including 45km pipeline to [redacted], hence disruption to wildlife and residents when installing pipelines.<br>d. There will be 5 pumping stations with approx. 30 million litres of water pumped per day, for 365 days/year. Carbon pollution will be produced by the pumping operation.<br><br>3. Financial<br>a. Project completion cost is estimated at £1.2 billion and may overrun! The existing, first stage project, is a fraction of this at £340million.<br>b. Large operational cost of new treatment works and 5 pumping stations (pumping 30 million litres/day).<br>c. Macquarie Investment Funds have the majority shareholding in Southern Water. Portsmouth Water owned by Ancala LLP who are managed by a number of ex-Macquarie partners. It would seem they may be working together for optimal financial gain rather than the best long-term solutions both for the customers and the environment.<br><br>4. Sustainable alternatives<br>a. Let the reservoir fill naturally from the spring water - allow the time to do this.<br>b. Overall water storage is the problem and only a tiny percentage of our rainwater gets used in the water supply. Storage options are as follows.<br>i. Store water in aquifers. Aquifer storage successfully used elsewhere.<br>ii. Build new reservoirs close to Southampton.<br>c. Existing river extractions can be moved to the tidal limit thus protecting all the freshwater catchment.<br>d. Southern Water loses approximately 100 million litres per day through leakage.<br>i. Money should be spent reducing this problem. If leakage could be halved, then it would be a substantial amount of the water proposed to be supplied by the WT&WR project.<br>ii. Water mains renewal rate is around 0.5% per year, meaning that the old, cast-iron, pipes, which were designed to last 100 -120 years, are expected to last for about 1000 years! Invest money in mains replacement to substantially reduce leakage.<br>iii. In the long-term money will have to be invested in solving the above issues, an expenditure which will be in addition to that proposed for the WT&WR project! So, in the long run the total cost will be much higher. Much better to fix these core problems in the shorter term.<br>e. Develop alternative solutions where ‘drinking quality water’ is not needed. Sometimes termed ‘grey water,’ this can be used by large water users such as golf courses, garden centres, agriculture, etc.<br><br>This is not a viable project. It’s bad for the environment, far too expensive, very unpopular and there are sustainable alternatives – so it’s unnecessary.<br>I very strongly object.<br><br>Regards | intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensures compliance of all discharges.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England’s Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |

| Reference | Feedback | Southern Water Response |
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| | | We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year, this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector. It is too early to say what the outcome of that work will be in relation to future rates of mains renewal. |
| WRMP59 | A Sustainable Solution to England's Water Scarcity - Norwegian Glacial Water<br><br>Dear Southern Water,<br><br>I hope this email finds you well.<br><br>My name is Inger Siri Helland CEO in Norwegian Premium Water AS . We have been following Southern Water's commitment to exploring alternative water sources to address the growing challenges of water scarcity in the UK, particularly in light of recent droughts and climate change.<br><br>Norway is renowned for its pristine natural environment and abundant freshwater resources. Our glacial waters are among the purest in the world, untouched by human activity and pollution. Given the increasing demand for reliable and sustainable water supplies, we believe that Norwegian glacial water could offer a compelling solution for Southern Water.<br><br>We propose a strategic partnership where we would supply Southern Water with bulk shipments of high-quality glacial water on a weekly basis. Our shipments would be transported in environmentally friendly vessels, ensuring a minimal carbon footprint.<br><br>Key benefits of our proposal:<br><br>Unmatched purity: Our glacial water is sourced from pristine, glacier-fed lakes, providing an exceptionally pure and refreshing product.<br><br>Reliable supply: Norway's abundant water resources guarantee a stable and consistent supply throughout the year.<br><br>Sustainability: Our operations prioritize environmental sustainability, from water sourcing to transportation.<br><br>Economic benefits: By partnering with us, Southern Water can secure a reliable and long-term water supply, while contributing to the economic development of both nations.<br>We would welcome the opportunity to discuss this proposal in more detail and explore how our Norwegian glacial water can address Southern Water's specific needs. Please feel free to contact me at your earliest convenience to arrange a meeting or call. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Thank you for proposing a partnership that relates to the use of Norwegian glacial water.<br><br>After careful consideration and consultation we have decided to withdraw the option to import water from Norway via sea tankers from our WRMP24. This decision reflects our commitment to the communities we serve and the environment. During our consultation on rdWRMP24 significant concerns were raised by a number of respondents about this option, which included the potential impact of this initiative on the UK's fish farming industry, wild salmon populations and local marine life, due to the threat of *Gyrodactylus salaris*. Gyrodactylus salaris is classified as a Non-Native Invasive Species and its introduction could have potential devastating ecological consequences.<br><br>Currently, there are no proven methodologies to guarantee that water imported from Norway via sea tankers would be free of Gyrodactylus salaris. Recognising the severity of this risk, we accept the possibility of introducing Gyrodactylus salaris poses an unacceptable risk. Furthermore, the logistical challenges associated with this proposal are significant. These include the procurement of services and obtaining planning permission for the pipeline construction through environmentally sensitive areas which could potentially lead to significant disruption. Given these challenges and the extended timelines required to address them, we believe it is prudent to consider more sustainable alternatives.<br><br>However recognising the potential of bulk import of water via sea tankers as an emergency drought measure, we are committed to conducting further feasibility studies to mitigate risks associated with water transfer through sea tankers, including sourcing the water from within the UK. These studies will help to inform WRMP29.<br><br>Further explanation is provided in Annex 20 and in the main fdWRMP24. |

| Reference | Feedback | Southern Water Response |
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| | Thank you for your time and consideration.<br><br>Sincerely, | |
| WRMP60 | This was an internal email sent to the WRMP inbox and was not a WRMP consultation response. | We do not need to respond to this email in this SoR but have included the number for completeness to show all of the WRMP reference numbers. |
| WRMP61 | Dear Sir or Madam<br><br>I have reviewed the Southern Water revised draft Water Resources Management Plan.<br><br>I have many concerns about what is being proposed.<br><br>In my view the proposed Effluent Recycling plan and the associated works is<br><br>· Expensive<br>· Inefficient<br>· Carbon Intensive<br>· A risk to our environment<br>· Does not serve the population<br>· Has a high risk of failure<br>· Not the best option available<br>· and it creates a bad precedent that will support other bad schemes.<br><br>I have attached my detailed review of the data made available to me - it does not look like a plan that is designed to serve the community in the short, medium, or long term.<br><br>Please take my comments under review when you consider approving or rejecting the plan, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. |
| WRMP62 | I am very concerned at the use of untested effluent recycling proposed at Havant thicket reservoir. I am very happy with the idea of storing clean spring water to use in Portsmouth water system but not mixed water as proposed by Southern water.<br><br>As I understand it planning has been agreed for the storage of spring water and not the pumping of effluent recycled water yet.<br><br>Southern water is going ahead with this plan on the basis it will get permission because this is a national infrastructure project.<br><br>I disagree with this stance. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |

| Reference | Feedback | Southern Water Response |
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| | It would be a national infrastructure project if it was for the storage of clean spring water as currently used in Portsmouth water pipes.<br><br>What is being proposed is an experiment, one that uses the Portsmouth area residents as guinea pigs and cannot in any way be seen as maintaining the current levels of water quality.<br><br>Adding effluent will be a massive down grade of current water quality and should not be allowed to go ahead.<br><br>Having not gained support at planning for their scheme to go ahead, Southern water, should rethink and come up with a complete new plan that meets the agreement of the customers they and Portsmouth water serve.<br><br>I fear this will not happen they will proceed with a slightly modified but essentially unchanged plan and get to a stage where they have done too much building of pipelines and such like that they are given permission because saying no will make the reservoir too expensive or unusable!<br><br>I am asking for clean water not sewage! | Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/ |
| WRMP63 | Hello,<br>As a local resident I would like to register my objection to the proposal to recycle effluent in the new reservoir. It is an insane proposal that must be stopped at all costs. People ( and we know who you are)in decision making positions on this subject will be held to account for the rest of their professional lives if it is allowed to go ahead. | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP64 | I am Chair of WildFish and I appeared at the 2018 Inquiry. This is my personal response not that of WildFish.<br>There is a fundamental underlying problem with Southern Water's Water Resources Management Plan (WRMP) and the consultation process. Far greater transparency is required. The WRMP is supposed to set out how Southern Water will meet their duty to match supply and demand in a way which is consistent with their environmental duties and objectives. The Plan is required to be regularly updated.<br>A key environmental objective of the Plan is stated to be to reduce reliance on abstraction and the latest draft states that leaving more water in the environment is the Plan's largest driver. The history of the planning process is that proposals have turned out to have been either unrealistic from the start (e.g. the [redacted] Desalination proposal) or to have planned timescales which were unrealistic (e.g the Water Recycling proposal).<br>Trust in water companies and the government and agencies supervision of them is at an all-time low. This is particularly so in relation to Southern Water's Plan. Following the 2018 Inquiry a s.20 agreement committed Southern Water to use "All Best Endeavours" to implement the Plan to provide the substantial additional supply necessary to reduce the reliance on abstraction from the chalk streams by 2027. This appears to have had no effect, and there does not appear to be any real incentive for Southern Water to keep to the timetables set out in the Plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/ |

| Reference | Feedback | Southern Water Response |
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| | The WRMP process is currently incomprehensible to the public and ineffective. Effective public and stakeholder involvement in the Plan and its process is vital if this is to change. This cannot happen unless there is much greater transparency.<br>The public and stakeholders need:<br>To understand not just what is proposed, but why, and to be able to check and comment on the reasoning.<br>To understand how implementation of the plan is progressing and to be able to check and comment on the implementation process.<br>Currently it is not possible for the public and stakeholders to understand not just what is proposed, but why, and to be able to check and comment on the reasoning. The plan documents are extensive and complex and do not enable even those with experience of complex documents and the ability to devote significant time to understand key reasoning. For example: there is no clear explanation for how the supply proposals add up to equate to the anticipated demand, and there is no clear timeline, critical path, or range of outcomes information for the major infrastructure proposals. It is difficult to see how a fair and effective consultation can take place against this background.<br>It is also not possible for the public and stakeholders to monitor the implementation of the plans proposals. There needs to be regularly published information about the progress of proposals, the reasons for any delay, and the action being taken as a result. How, for example, can the public and stakeholders judge whether “All Best Endeavours” are being used in the absence of such information?<br>The urgent provision of extra water supply infrastructure for Southern Water’s area is of critical importance to the environment and customers. The planning for and implementation of the necessary infrastructure needs to be dramatically improved now. Without proper transparency that is unlikely to happen.<br>Southern Water must be required to commit to producing and making public clear and realistic information about their proposals and their timing, and to update and publicise that information on a regular basis. | The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing. With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP65 | The purchase of land and creation of soak aways to pipe excess water into would make much more sense as it’s replicating a natural environment.<br><br>Southern Water’s proposal to use concrete to construct concrete cylinders that are nothing more than uncontrollable storm overflows, and blots on the landscape is utterly ridiculous and should not be allowed. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Soakaways are generally used for small surface area domestic settings. At Southern Water we deal with massive flows, that would overwhelm and flood soakaways if sufficient impermeable area was connected. It could be effective to disconnect individual properties and drain their stormwater to a soakaway (subject to geology and ground conditions) but water companies have no statutory powers to alter, repair or improve private drainage systems. |
| WRMP66 | Please rethink your plans ,put in more reservoirs to catch our abundant rain fall,(1%)used at present, and clean up your act, allow my family and I to get back in the sea and continue our various activities with out the worries of what we are swimming in! No to effluent recycling!! | Thank you for reviewing our rdWRMP24 and providing feedback. We note your objection to effluent recycling.<br><br>Regarding effects of recycled water on local habitat and ecology, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br>All plans will be subject to the appropriate environmental due diligence as they evolve. |

| Reference | Feedback | Southern Water Response |
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| | | Regarding storage, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP67 | I wish to OBJECT to Southern Water's revised draft water resources management plan which included [redacted] effluent recycling via Havant Thicket Reservoir.<br>I am a 79 year old resident of Rowlands Castle and might not be around for the completion of this project, but nevertheless, looking to the future I ask myself this question, would I like to think that my grandchildren will have no choice but to drink effluent water that has been recycled, and the answer is an emphatic NO!<br>In the recent past Southern Water's records on fixing leaks and allowing untreated overflows into the sea have been abysmal and I am not confident in them doing any better in the future.<br>Surely the most cost effective and environmentally way forward would be to capture natural rainfall which we are told is only going to increase due to climate change.<br>What happens if effluent being treated at [redacted] leaks into the pipework feeding the reservoir, no doubt Southern Water will say that will not be possible , I say anything is possible and this would put many, many peoples health at risk.<br>There is talk of importing water by tankers from Norway, how can we be sure this has not been recycled effluent and whatever else might be in the water. the horrendous cost of this operation could be better spent fixing those leaks and replacing mains.<br>Overall these latest proposals will use huge amounts of energy, carbon and chemicals, does this not go against government environment policies.<br>I sincerely hope that you will rule against this proposal. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050.We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding the safety of water brought in by tanker, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP68 | I am writing to register my objections to the new proposal at The Havant Thicket resevoir.<br><br>I am against the proposals for a number of reasons:<br><br>Re-cycled effluent water, the first such scheme in the UK, is unacceptable. It is not only untested but would also set a dangerous precedent for other water providers. Rainwater would provide a good quality raw water resource and I strongly urge Southern Water to stick to their initial plan for the Havant Thicket Reservoir, whereby the reservoir collects rainwater instead of channelling effluent water there to be treated.<br><br>The proposal will result in an unacceptably high carbon impact and greenhouse gas emissions total. The spiralling costs, delays as well as the short lifespan of the project does not offer the best value for money to their customers. The carbon and energy cost estimated at £3 million pounds per year is not acceptable. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the need for a new consultation, we consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. |

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| | A more sustainable alternative needs to be drawn up where instead of working against the predicted changes to our climate, they instead work with it.<br><br>In order to address the issues of a growing population and more demand for water SW also needs to invest in repairing the leaks in a robust mains replacement programme. The current lose of around 19% of the water they take from the environment is also highly unacceptable.<br><br>If winter rainwater was collected at the site, this would see the area through a dry summer and is, without doubt, the best option for the scheme. How can ferrying water from Norway in a drought (the proposed option) be a viable choice? It is both prohibitively expensive as well as working against environmentally friendly options.<br><br>They need to listen to public objections as well as concerns expressed by the regulators. SW should engage with their paying customers to get their feedback on the changes. They should review all available options and a full public consultation should happen.<br><br>I agree that urgent action needs to happen, however, sustainable solutions need to be drawn up that work with the environment instead of against it.<br><br>How can SW customers (those who can afford it) buying bottled water, because they don't want to drink recycled effluent water, be a good option for the environment? | Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>On leakages, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>On ferrying water from Norway, this option is no longer included in our plan. |
| WRMP69 | I am emailing to object about Southern Water's Plans for Effluent Recycling and water management.<br><br>Regarding recent consultations from Portsmouth Water and Southern Water, it appears as though a lot of the same proposals just keep getting recycled for comment again and again, with no account taken of the huge amount of previous feedback.<br>In my view, the current plan is worse than previous ones. I am extremely concerned about the guaranteed pollution arising from this Plan.<br><br>My main concerns are:<br>1. The drought plan to tanker water from Norway. This seems ridiculous in many ways - very expensive, resource hungry in terms of fuel and time, doesn't do anything to address the drought problem, and quite unnecessary if Southern Water properly managed the water resources we have available to us.<br>2. 19% of all water that Southern Water abstracts is lost through leaks. Their plan to repair leaks is slow and ineffective. Repairing leaks should be a much higher priority and given more urgency. This would go a long way to meeting water needs.<br>3. The effluent recycling scheme is wrong on every count. If Southern Water more effectively managed and stored water resources, effluent recycling would not be needed. Effluent Recycling is an expensive option, not only financially, but also bad for the environment. The infrastructure required to manage this would be a huge undertaking, disruptive of the environment, polluting, and dangerous so close to the waters edge at BroadMarsh. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>On the scheme to tanker water from Norway, this option is no longer included in our plan.<br><br>On leakages, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>1. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: |

| Reference | Feedback | Southern Water Response |
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| | 4. Based on Southern Waters' record over the past 10-20 years, it is almost guaranteed that they will put contaminated water into the Reservoir. Once contaminated water is put into the Reservoir, it will not be flushed away by sea tides or a river flow, the water will remain in the Reservoir. I feel they cannot be trusted and should not be allowed to pollute our drinking water.<br>5. Southern Water has already polluted Chichester Harbour and surrounding areas. This new Plan is likely to have a significant negative effect on the marine environment, as concentrated effluent will be regularly discharged into the Solent. In addition, recent studies show that the tides move this contaminated water back to the shoreline, making the sea potentially dangerous for those who use the sea for work or recreation.<br>6. I have had to actively seek out this information. I believe that this public consultation is being kept very quiet, in an effort to avoid feedback from the public. The public are not engaged in this Consultation, and this is wrong, as it is such an important issue for anyone who drinks water from their taps, and cares about the environment, and how their money is spent.<br><br>My preferred options are:<br>i) move water abstractions from the upper catchment of rivers to the tidal limits<br>ii) aquifer storage to store surplus water in the winter, so that this water is available to use in the summer (or when it is dry)<br>iii) catch and store more rainfall. Keep this water out of the sewers, so that it does not just flush out to sea with the effluent.<br>iv) no effluent recycling. Reduce the need for expensive and long pipes moving water around the countryside, by being more efficient and effective at abstracting and storing water.<br><br>Continuous contamination of our seas, rivers and now potentially our drinking water has happened because of decades of lack of investment of public money, in order to line executive and shareholder pockets. This is morally appalling and a criminal offence - and should be treated as such.<br><br>Please confirm that you have received this email, and advise me of the next steps. | https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>2. A consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>On the relocation of abstraction points, we have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Further information on our options appraisal regarding MAR/ASR schemes, small storage reservoirs and moving abstractions downstream can be found in Annex 20 of our fdWRMP24. |

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| WRMP70 | Dear Sir<br>I write with concern for the proposal for Southern Water's plan to recycle sewage effluent into drinking water.<br>I'm calling on DEFRA to stop this plan for the following reasons:-<br><br>Huge environmental concerns for the proposed methods of delivering the sewage to a processing plant, the impact this will have with the work that it will take to proceed with this proposal.<br><br>Deliberate suppression of cheaper, greener solutions for financial reasons.<br><br>Complete breakdown of public trust in Southern Water, after the initial proposals for the New Reservoir at Havant have been completely changed. ie pleasure activities for the public sailing etc.<br><br>The risk of contaminating even further what is a complicated process to supply potable water Portsmouth Water Customers.<br><br>A complete turnaround from the initial proposals<br><br>Yours faithfully | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. We look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. It is not expected to impact the proposed recreational use of Havant Thicket reservoir. |
| WRMP71 | I object strongly to Southern Waters proposals for using treated water to fill Havant Reservoir. The original proposal was to use rain and spring water.<br><br>The forecast for more wet weather. Using rain water would be the ideal thing and no millions of pounds treating poo for us to drink YUCK! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Regarding capturing more rainfall, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP72 | I won't pay for sewage water ! | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP73 | Dear those concerned<br><br>I would like to express my concerns re. The proposal, there are environmental, climate and sanitation concerns. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can |

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| | This appears to put all eggs in one basket. More could be done to resolve leaks, houses could be designed to use bath/waste water for toilets rather than this option.<br><br>I strongly object to the proposal. | realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, at the individual customer level. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP74 | Good day,<br><br>I am completely against your proposal as identified in<br><br>https://havantmatters.org/water/wrmp2024/<br><br>The arguments identified by another respondent totally encapsulate the sick and twisted mentality of S.W.<br><br>Please challenge S.W. and make them rethink | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP75 | The purpose of this email is to object to Southern Water's plans for Effluent Recycling and water management.<br><br>I would like to emphasise that I fully supported the planning application made by Portsmouth Water for a reservoir that would be filled with water sourced from local chalk fed freshwater springs. It would also have included water being taken across to [redacted]. In making the application, Portsmouth Water were very open and conducted a very informative consultation. I attended one of the consultation presentations.<br><br>By contrast, there seems to have been little publicity about this consultation. Parts of the documentation are not available for public viewing. There does not seem to be much transparency about the scheme, all alternatives considered or a justification for such a huge infrastructure heavy, energy intensive scheme with great potential for contamination and pollution incidents and finally, huge environmental impact during construction.<br><br>1. Concerns about the proposals.<br>1.1 Southern Water has only put forward the effluent recycling scheme in these proposals. Only one alternative to the scheme is referred to namely, bringing water in from Norway. This would be hugely expensive, a logistical nightmare bearing in mind the distance that the water would have to be shipped and a potential environmental disaster. The water would be totally different from that in this country and could contain contaminants and invasive species. It is suspect that | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>On the bringing water from Norway, this option is no longer included in our plan.<br><br>On promoting water butts, our business customers are able to claim a free water butt from us as outlined here: https://www.southernwater.co.uk/save-a-little-water/saving-water-in-your-business/water-butts-scheme/. Slow-drain water butts are also effective in reducing water run-off and decreasing the pressure on storm sewers, as our pilot scheme on the Isle of Wight has shown, and we have now installed over 4600 water butts: https://www.southernwater.co.uk/latest-news/free-water-butt-initiative-expands-to-gurnard-on-the-isle-of-wight/. These water butts have a drain installed halfway up, allowing the top half to slowly drain into the network over several hours. This way around 100 litres is left empty for the next time it rains. Following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex. |

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| | only one unworkable alternative to water delivery was presented. See below for other options. What else was considered and why has it been discounted?<br>1.2. There is plenty of rain in the winter as there was last summer. The absence of a viable catchment scheme for the surplus water is a lost opportunity. Gardeners achieve this with the use of water butts. It is simply a difference in scale.<br>1.3. The proposed siting of the recycling plant on an ex landfill site with known contaminants should be a major reason for rejecting the proposals. Tunnelling, piling and building in this area will inevitably result in the leaching of contaminants into the ground water and the harbour as the landfill site was not contained above or below the waste.<br>1.4. The construction works conducted over several years would have a detrimental impact on the birds that use the harbour muds.<br>1.5. The visibility impact of the plant buildings and tanks in this coastal area. Adequate screening would be debatable due to the known contaminants in the area that could kill any planting.<br>1.6. I have grave concerns about the proposed discharge out to sea of the 'reject waste'. This waste will be of a higher concentration than at present. The existing discharges cause many problems for anyone using the coastal waters such as swimmers, rowers, paddle boarders etc who have to check apps for information as to the safety of the water. There is significant potential for environmental damage to the Solent and Langston Harbour areas including the Special Protection Area.<br>1.7. The treatment and energy costs of operating the plant throughout the year will be huge not least because of the distances and terrain over/ through which the water would need to be piped. It would be much better to build water solutions close to the consumption area. Net Zero Carbon ambitions do not appear to have been considered at all.<br>1.8. Personally, I want to continue receiving water from Portsmouth Water and I do not want to routinely receive recycled water particularly where there is no need for it.<br><br>2. Concerns about Southern Water's involvement in the Havant Thicket Reservoir.<br>2.1. A major concern is the involvement of Southern Water in this project at all. It has a very poor track record on sewage discharges and leaking pipework and sewers. For example, in 2021, it was fined a record £90 million for dumping sewage in the sea between 2010 and 2015.<br>2.2. I am very concerned that Southern Water will be in control of the recycling plant. Portsmouth Water state that they are confident that they will be able to control what is pumped into the reservoir with a back up of shutting down the pipeline. This cannot be so as they will have to rely on data provided by Southern Water which could only be provided after any pollution incident. If there is an incident, then its effects are permanent as the reservoir is contained and is neither tidal nor has a river flow to mitigate the situation.<br>2.3. There is to be no independent monitoring of discharges into the reservoir.<br>2.4.1. I think that Southern Water's precarious financial position should also be considered. They do not maintain or improve the existing infrastructure and pipework. This results in some serious problems such as the recent series of leaks from the pipework under the Eastern Rd in Portsmouth resulting in the road having to be closed for urgent repairs on a number of occasions. This is one of three arterial routes into the city. It caused huge disruption on each occasion. | On the site of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Regarding impacts on wading birds, all plans will be subject to the appropriate environmental due diligence as they evolve.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>On the relocation of abstraction sites, we have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>On constructing new reservoirs, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Furthermore, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have |

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| | 2.4.2. If existing infrastructure is not maintained, how will they ensure that the complex machinery at the proposed plant is meticulously maintained and repaired as well as the proposed miles of pipework that in many places will be in difficult terrain. If the money to do so is not there, then who bears the cost and carries out the necessary work?<br><br>3. Options that should be considered.<br>3.1. The protection of rivers should be a priority. This can be achieved by moving abstractions from the upper catchment of rivers to the tidal limit. This would enable large quantities of river water to be captured before it flows out to sea and is wasted. Abstraction higher up the rivers could be totally or substantially reduced.<br>3.2. Prioritise the investigation and delivery of new reservoir schemes and aquifer storage solutions. There is no shortage of water in this area. It is currently not captured for use when required at a later date.<br>3.3. Regular monitoring and amendment of abstraction licences based on evidence of harm including revocation of the licence where there are continual breaches of its terms.<br>3.4. The implementation of a robust improvement, replacement and maintenance program of the distribution system to bring the existing leakage under control.<br><br>I think that the reservoir should be solely fed by the local chalk streams. No treated water should ever be discharged into it. We have a unique opportunity in having a reservoir as per the original planning permission.<br><br>Kindly acknowledge receipt of this email. Please also advise me as to what will be happening next. | considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding leakages, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Portsmouth Harbour WTW is already in existence. The water recycling plant will be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below:<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders They have injected more than £1.6 billion of fresh equity into the Southern |

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| | | Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans and that when the Competition and Markets Authority (CMA) makes its PR24 determination it will provide sufficient funding for the investment in the 2025-2030 period.<br><br>Regarding point 3.3, all abstraction licences are issued by the Environment Agency (EA) and our regulators monitor licence compliance and environmental impacts closely. Where there are thought to be risks to the environment from an abstraction the Water Industry National Environment Programme (WINEP) requires that water companies investigate and, if necessary, alter their abstraction licences to ensure abstractions are sustainable. In addition, a permit is required from the EA for the release of purified recycled water into Havant Thicket Reservoir and of reject water from the proposed Water Recycling Plant to the Solent. We will apply for this permit alongside our Development Consent Order application. |
| WRMP303 | I refer to the above Management Plan with respect to a serious risk to human health resulting from the recycling of effluent from a local sewage treatment works into the proposed Havant Thicket Reservoir<br>It is understood that Southern Water proposes to pump sewage effluent into the new reservoir at Havant Thicket , which was originally approved by Havant District Council to store pure spring water for distribution to the residents living in the Portsmouth area served by the Portsmouth Water Company.<br>It is now proposed to pump sewage effluent to mix with the pure spring water.<br><br>It is proposed to filter the water using a reverse osmosis process.<br>Sewage effluent contains viruses and bacteria which are harmful to human health<br>The scheme places total reliance on reverse osmosis to render the water free of all infectious material.<br>This poses a massive risk to human health as reverse osmosis is not a guaranteed process able to remove every virus and bacteria.<br>It relies on full proof maintenance procedures being adopted 24 hrs every day for ever.<br>The quality of control used by Southern Water and the almost total lack of supervision by the Environment Agency which has allowed the sea and UK rivers to be polluted with sewage, guarantees that the sewage effluent to be pumped into the Havant Thicket Reservoir will not be properly and safely treated.<br>Placing the health of the residents at risk around the Portsmouth area is a criminal offence and must not be allowed to happen.<br>Sewage effluent cannot be made 100% pure for drinking by Portsmouth Water customers who have no alternative source of water supply.<br>Defra and the Environment Agency have a Statutory Duty to protect the UK residents from pollution particularly with respect to drinking water supplies. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire, due to the abstraction reductions that are necessary to protect the rivers Test and Itchen.<br><br>Water recycling technology is tried-and-tested in other parts of the world, including in Australia, Singapore and the USA, where companies have been recycling wastewater to create a drinking water source for more than 40 years. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The reverse osmosis process uses membranes with perforations more than 50,000 times smaller than the width of a human hair. It is followed by a process called advanced oxidation, which uses ultraviolet light and hydrogen peroxide to further purify the water. These processes remove the vast majority of impurities in the water including pharmaceuticals, bacteria and viruses to produce purified recycled water. The purified recycled water pumped into Havant Thicket Reservoir will have already been through two treatment processes; once at Portsmouth Harbour Wastewater Treatment Works, then a second time through the recycling plant. Water abstracted from the reservoir would be then be treated again to strict |

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| | | drinking water standards at our Itchen Surface Water Supply Works before being sent into supply.<br><br>Water quality will be continuously monitored throughout the water recycling plant to ensure it only passes forward to the next stage of the process if it meets defined standards. This includes water entering the Havant Thicket Reservoir. We are one of a number of UK water companies developing water recycling plants. We therefore want to play our part in building confidence in the water recycling process and providing assurance that safeguards will be put in place to ensure regulatory and environmental requirements will be met and stringent water quality standards maintained. Further information can be found at https://www.southernwater.co.uk/about-us/our-plans/water-recycling/hampshire-water-transfer-and-water-recycling-project/ |
| WRMP354 | I have spent some time reading Southern Water's latest Draft Waters Management Plan and the Havant Matters Water Matters overview and 40 key concerns. We moved to Rowlands Castle in December 2020 and live at the top of Redhill Road very close to where the reservoir is already under construction. We walk in and around Havant Thicket and the Staunton Estate regularly, almost daily and have been interested in the progress being made and in particular the overall aesthetic of the project compared to the initial artists impressions. The idea of having a large area of clean water, a new reservoir used to collect and store raw water from the chalk streams, fantastic! Far better than another large housing estate. A large area of fresh, clean water supporting and providing clean air for the environment, wonderful!<br><br>I was initially concerned when plans were changed not to remove the soil and groundworks necessary to create the various levels required but to understand the plan had been "developed" to simply relocate all the groundworks on site. A classic case of agreeing one thing with planners and then applying to change the initial plan with little or no consultation, no doubt to massively reduce construction costs. The idea of ending up with something like the reservoirs created in the south West of London with huge embankments was not what was envisaged or agreed to at all.<br><br>We now discover Southern Waters proposals to hijack the complete purpose of the agreed project and use the reservoir once completed for a completely different purpose to what was agreed. Now proposing to back pump and store "treated and recycled" water from their effluent / sewage plants. This is a very different proposal to what has been granted permission, the storage of raw naturally occurring fresh water otherwise lost, pumped from clean chalk streams. DEFRA appear to be doing a good job in contesting the proposal and I fully support their work. The level of trust enjoyed by Southern Water must be pretty close to zero and they are not to be trusted. They are looking for a cheap on their doorstep solution to problems they have had many years to avoid. They have no real interest in the environment and this is clearly demonstrated by there repeated proposal to transport water from Scandinavia in times of drought. How in any ones mind could that be considered a sensible environmentally acceptable solution? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire, due to the abstraction reductions that are necessary to protect the chalk stream habitats and ecology of the rivers Test and Itchen, particularly during a drought.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir, and regarding changes to proposals for the reservoir itself, such as the inclusion of embankments, this is a question for Portsmouth Water, which is developing the reservoir.<br><br>Our proposals, involving the construction of a water recycling plant near Portsmouth Harbour, Havant and pipelines necessary to transport treated water, are covered by the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and details for this project are available on our dedicated website https://www.hampshirewtwrp.co.uk/ On this page you'll find details of a further consultation on water quality, held in March 2025.<br><br>Southern Water and Portsmouth Water are working together to investigate the possible effects on water quality within Havant Thicket Reservoir based on various operational scenarios. This analysis is ongoing with further engagement on the results to come later. Our assessments will also be fully reported on in our Environmental Statement, which will be submitted as part of our application for development consent. Water quality will be continuously monitored throughout the water recycling plant to ensure it only passes forward to the next stage of the process if it meets defined standards. This includes water entering the Havant Thicket Reservoir.<br><br>We are one of a number of UK water companies developing water recycling plants. We therefore want to play our part in building confidence in the water recycling process and providing assurance that safeguards will be put in place to ensure regulatory and environmental requirements will be met and stringent water quality standards maintained. |

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| | I am fully supportive of the initial plan but completely horrified and untrusting of what is now being proposed by Southern Water. It will be a disastrous outcome to a what was a sensible project to collect, back pump and retain the fresh chalk stream waters we have flowing naturally through our countryside. The initial plan for the reservoir agreed and positioned at a relatively high altitude will not be greatly contaminated by agricultural activity and provides an excellent and I would suggest fairly unique opportunity, to achieve something really purposeful and environmentally positive right on the edge of the South Downs.<br><br>Southern water are busy pumping huge volumes of untreated sewage into Chichester, Langstone and Portsmouth Harbours. Far more than in the past and its got nothing to do with overflowing storm drains or high levels of rainfall. I have sailed on the south coast for the past 35 years. I have never experienced or seen raw sewage in the water and marinas like I did last summer. Even during the driest periods Please do all that you can to resist Southern water's recycling proposals. | All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>Regarding sea tankering from Norway, this option is no longer included in our plan. |
| WRMP372 | Dear Sir/Madam,<br><br>I believe that the revised Water Resources Management Plan has not been thought through properly.<br>It would make much more sense to collect Winter rainfall nearer to where it will be supplied and to store it for use in the Summer.<br>Water could also be abstracted from the Rivers after heavy rain, to help prevent flooding.<br><br>It would avoid the necessity of the construction of 26 miles of pipeline and all the associated disruption and costs,<br>Including the future running costs of pumping water long distances.<br><br>I also think that there is (rightly) a general lack of confidence that the proposed plan to treat Water from the toilet into drinking water is healthy and without danger of serious problems occurring.<br>I am sure that many more people would be wanting to buy bottled water, leading to excessive plastic waste.<br><br>Definitely serious measures need to be taken to avoid the excessive discharge of sewage into Langstone and Chichester Harbours and the Solent. (Also many other places in the country.) That is a massive ongoing issue. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We acknowledge concerns raised about the need for our Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us, as outlined above. In addition, the length of pipeline is necessary to convey the treated water to and from existing infrastructure, such as the reservoir and water supply works.<br><br>Water recycling technology is tried-and-tested in other parts of the world, including in Australia, Singapore and the USA, where companies have been recycling wastewater to create a drinking water source for more than 40 years. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from |

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| | | recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ In addition, further information regarding work the relevant Southern Water teams are undertaking to reduce storm overflows to the harbours, as well as to rivers and seas across our region, can be found here; https://www.southernwater.co.uk/about-us/our-plans/clean-rivers-and-seas-plan/ |
| WRMP384 | Dear sir/madam<br><br>It concerns me that the new reservoir being built in Havant is not going to be used as original intended. My understanding is that planning was granted on it storing spring water. Now I hear that southern water want to use it to use reclaimed water from their foul water collection network.<br><br>I for one object to southern waters plan for it to be also used for the storing of reclaimed water. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling technology is tried-and-tested in other parts of the world, including in Australia, Singapore and the USA, where companies have been recycling wastewater to create a drinking water source for more than 40 years. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP412 | Sirs, apart from the environmental impact of recycling sewage , i and my family do not relish the thought of drinking water like this that has had chemicals and such added to it.<br>Please, please find another way of making our water safe to drink | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Water recycling technology is tried-and-tested in other parts of the world, including in Australia, Singapore and the USA, where companies have been recycling wastewater to create a drinking water source for more than 40 years. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long |

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| | | term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP417 | I am extremely concerned about the revised Southern Water plans for effluent recycling at Broad marsh and Havant Thicket. As a local resident and firm sustainability advocate I am very worried about how this project will affect the environment, while also not being good value for Southern Water customers.<br><br>The discharge of this sewage into the new reservoir and into our rivers and harbours, not to mention the huge carbon impact from construction and operation cannot come at a worse time for the planet, when we should all be working towards projects that help the environment and reverse climate change instead of making it worse for everyone.<br><br>Please please find more environmentally friendly solutions to this project, the planet depends on it. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>All water companies in England work with regulators to carry out investigations through the Water Industry National Environment Programme (WINEP). One of the many objectives of the programme is to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes such as water recycling which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling or desalination plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding concerns that water recycling will involve the discharge of sewage into the new reservoir, this will not happen as the water recycling proposals are fundamentally different, and separate, to the network of storm overflows. Storm overflows are a feature of the combined sewer network, built into the system to allow the release of excess flows from sewers into rivers or sea when there is an overload in the network, usually caused by heavy rainfall but sometimes by excessive groundwater infiltration. We know that our continued reliance on these legacy features of the sewer network is no longer acceptable and we are working to reduce their use through our Clean Rivers and Seas Plan (https://www.southernwater.co.uk/about-us/our-plans/clean-rivers-and-seas-plan/ ). So whilst storm overflows, rather like the overflow on a bath or sink, are built into the sewer network to release excess flow to prevent flooding, these features are entirely separate to the recycling plant and will not be connected to it. More information on how storm overflows operate is |

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| | | available here; https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/storm-overflows/ |
| WRMP457 | I am writing to strongly object to the Southern Water (SW) Draft Water Resources Management Plan. I urge you to reject it in favour of them having to explore and implement options that work with climate change mitigation and adaptation, don't pollute and give better value for money before they resort to effluent recycling.<br><br>My reasons for objecting include:<br><br>1. Huge new infrastructure building of the plant, pumping stations and kilometres of pipelines needed for effluent recycling creates an unacceptably high embedded carbon impact, especially as we are in a climate emergency. I strongly believe that because SW can make huge profits from such building and can't make profits from fixing leaks and repairing water mains skews the options they are willing to consider.<br><br>2. The process of reverse osmosis under high pressure requires huge amounts of energy. SW are proposing to address intermittent summer drought with effluent recycling which has to operate 365 days a year. The daily operating energy demand of this is incompatible with trying to improve national energy security and reduce energy demand. The huge carbon impact will last for the 60 year life of the plant way beyond SW's own 2030 target for net zero.<br><br>3. The recycling process results in reject water release into the sea or other water bodies and this release is 4 x more concentrated than it was at the start. All schemes require release to an environmental 'buffer'. This will cause changes in water composition (salinity, temperature etc), pollution risk, the effect on the ecology is uncertain, there is bio-accumulation risk and possible | Thank you for reviewing our rdWRMP24 and providing feedback. Please find below our response to your comments.<br><br>1. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>1. & 2. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Climate change is pivotal to much of the work we are doing. As stated in the Government's policy paper Water abstraction plan: Environment - GOV.UK "A changing climate is likely to bring greater variability in rainfall and higher temperatures. We expect less groundwater recharge and larger seasonal variations in river flow as well as changes to when and how extended dry periods occur."<br><br>3. We are not planning to discharge any reject water from Littlehampton into the sea. |

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| | sediment build up. Given that there will be no independent monitoring and SW does not have a good track record on its willingness to avoid polluting there can be no public confidence in this scheme. SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme (eg warm brine and chemicals the effect of which is more pronounced during drought). Modelling for water quality impacts on Thicket Reservoir is still not available. The scheme should definitely not move forward until the environmental risks/impacts are known.<br><br>4. The SW plans include building on former landfill sites. Hundreds of piles will be driven in with serious risk of leachate from the landfill sites entering Langstone Harbour, and the sea at the Isle of Wight site. These sites should definitely be rejected. | The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the Environmental Assessments for the WRMP. Work is being undertaken by our consultants WSP to address these comments and make any necessary changes to ensure that the assessments align with regulatory requirements.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>4.Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>5. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making huge investments to reduce our need for the Candover/ Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new |

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| | 5. The UK currently captures only 1% of rainwater and with increased rainfall predicted due to climate change we should capture more winter rain to use in dry summers before we rush to effluent recycling. Rainwater is good quality and capturing it helps to reduce flood risk. SW say they have 'parked' more sustainable options that work with predicted climate changes. Why? | schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Our audits generally include fixing leaky loos, taps, showers etc. and/or fitting water-efficient devices as well as recommending other water efficiency improvements your business can make such as rainwater harvesting.<br><br>The audit (and the fixes) are free and we've partnered with the charity Groundwork to deliver this initiative. More information here: https://www.southernwater.co.uk/save-a-little-water/water-saving-audits/<br><br>We aim to replace all our existing household and non-household (industry) water meters with smart meters during AMP8 (2025-2030). Given the challenges we face in the Central area, we have prioritised Sussex North WRZ and Sussex Brighton WRZ for roll-out of the smart metering programme for household customers.<br><br>We are also reviewing an accelerated programme of non-household demand management in Sussex North WRZ to reduce industry and agriculture water consumption.<br><br>Our home visits programme and schools programme are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water.<br><br>We have provisionally included a high number of home visits in our plan. However, our on-going activities and interactions with customers suggest that there are alternative ways of achieving demand reductions in a more effective manner. We will be exploring these in further detail over AMP8 and adjust the number of planned home visits and non-household water audits accordingly. |

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| | | 6. On leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>7. Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>8. On population growth forecasts, for dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>Regarding your summary, our comments are as follows:<br><br>• Please see point 5.<br>• Please see point 6.<br>• We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |

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| | 6. SW lose 19% of all the water they abstract, ie 100million litres per day (which customers pay to treat) through leakage and they will lose some of the hugely expensive recycled water too. Their plan to reduce leakage by 53% by 2050 is under ambitious and industry experts say they could aim for 50% by 2040 and 70% by 2050 which would help to make recycling a last resort option.<br><br>7. Tankering water from Norway in a drought is obviously not a credible drought plan and should be rejected!<br><br>8. SW are hyping population growth forecasts (23% as compared with Ofwat's estimate of 17%), exagerating likely levels of abstraction reform and assuming no winter abstraction from rivers Itchen and Rother and thereby inflating their demand forecasts in order to justify their reckless plans.<br><br>There are better alternatives SW could pursue:<br><br>• Capture more rainfall<br>• Reduce leakage and increase the rate of mains replacement - SW are currently only aiming to replace 1 in 1000 years and yet mains only last 120 years.<br>• Move abstraction downstream to the tidal limit so that watercourses rejuvenate<br>• Use contained aquifers to store rainfall (Managed Aquifer Recharge Schemes). This requires much less infrastructure and so has less profit potential. SW knows of possible sites but has parked these til 2029, is this why?<br>• Create new winter storage reservoirs - The cost of the Hampshire effluent recycling plant is currently estimated as £1.2b and spiralling upwards (and with only 60 years longevity), whereas 3 winter storage reservoirs could be built for the same money and eventually have a legacy benefit often becoming wildlife or recreational sites.<br>• Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to reduce their use of drinking water for non-potable uses. This can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions. | • A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>• On building more reservoirs, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water, with the possibility of building a third (River Adur Offline Storage). Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>However, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Regarding the HWTWRP, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately |

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| | Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year with huge carbon impact, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers and the same applies to the other ones under consideration.<br><br>I believe the Government should take water back into public ownership, but they certainly could do more and challenge the leakage targets to insist they are more ambitious, and also change funding mechanisms to favour maintenance and renewal work instead of new infrastructure projects.<br><br>SW is taking us in the wrong direction and wasting the opportunity to make sure water resources are planned in a more sustainable way. | £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>A key benefit of Havant Thicket reservoir is the ability to store recycled water ahead of and during a drought.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding our function as a business, as a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/ |
| WRMP462 | I am writing to express my strong objection and serious deep concern about the plans of Southern Water and Portsmouth Water to use the new Havant Thicket Reservoir to supply local residents with drinking water from treated effluent via the process of reverse osmosis.<br><br>I would be really grateful if you could take the time to read my full submission and fully consider the points made. Thank you.<br><br>Other solutions that would be cheaper and more sustainable have not been properly researched. These include reducing water leakage which is currently estimated at 108.5 litres a day and improved rainfall collection, currently estimated at 1% in the UK. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>On leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | There are several reasons for my concerns, ie<br>The proposed solution is hungry on energy, carbon and overall financial cost.<br>The construction of pipes and tunnelling risks polluting our local harbour (Langstone Harbour) with leachates.<br>Pharmaceutical pollution – sewage is not tested for this and only organic waste is removed on treatment.<br>The inevitable increase in bottled water usage amongst the population and its environmental impact.<br>The new effluent recycyling plant at Havant, near the current treatment works at Portsmouth Harbour WTW, is planned to be built on a former landfill site, giving rise to environmental concerns.<br><br>I have concerns around the transparency of the water companies in fielding this proposal.<br>There are already trust issues around these water companies, they have repeatedly been fined for breaches of the law regarding sewage dumping in rivers and seas.<br>The original local authority planning consent for the build of the reservoir in Havant Thicket was for raw water and it seems the majority of local residents still anticipate this to be the case.<br>However Southern Water are having this project designated as a 'nationally significant infrastructure project', therefore bypassing local planning authority and straight to yourselves.<br><br>There is very little precedent worldwide for the use of reverse osmosis for long term drinking water. In Singapore, due to a natural shortage of water, it is used to supply 40% of the country's water needs, but for industrial/brown water, not tap water. However, in Singapore, Reverse osmosis is being used for desalination, not sewage treatment.<br><br>The website ntu.edu.sg, gives the following reasons for RO not being used for drinking water supply.<br>https://blogs.ntu.edu.sg/hp3203-1718-s2-12/our-water-supply/<br><br>"Why can't you drink reverse osmosis water?<br>Contaminants not removed from water by RO filters include dissolved gases such as hydrogen sulfide, a common nuisance contaminant with characteristic rotten egg odor, which passes through the RO membrane. Some pesticides, solvents and volatile organic chemicals (VOCs) are not removed by RO".<br><br>The plans to supply household water from effluent recycling have been mooted for use as a drought resource only, however once in place, the plants will have to operate all year round, whether drought conditions or not.<br><br>I live in Havant, Hampshire. This is on the edge of the south downs, an area rich in pure, natural springs. We are always one of the last (if not the actual last) areas to experience drought conditions. If water is short here, then surely the water leakage needs to be addressed first, | We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>Regarding energy, carbon and finance, water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Regarding construction a further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations<br><br>On pollution and reverse osmosis, no untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. No one piece of treatment equipment manages all contaminants. All treatment methods have limitations and often situations require a combination of treatment processes to effectively treat the water. Activated Carbon (AC) filtration and/or sediment filtration is commonly used in conjunction with RO filters.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. |

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| | alongside the capture of the bountiful rainfall that we have in this country. Especially as the latter appears to be increasing in recent times.<br><br>I am really concerned about the long term health benefits of the drinking RO treated effluent both on the environment and on human beings. I am one of many people who suffer from long term digestive conditions and I cannot believe that this would be improved by this water. I do not believe that anybody really knows what the harm is likely to be, as there is a lack of research and worldwide precedent. Please do not allow the phrase 'there is no evidence of any harmful effects' be used to mitigate the fact that there is no evidence that it is safe either.<br><br>I would also find it difficult to believe that if this RO process was put into place, that it could ever be reversible.<br><br>I just do not understand why any human beings can look at this process and believe that the best way forward would be to impose RO treated drinking water on a local population. Especially given the possibility of alternatives that would be more cost effective and environmentally sustainable.<br><br>The water companies have managed to bypass local planning controls and DEFRA is now the only hope to avoid this happening. Please take into account the points are being made by myself and other individuals. It is possible that there may not be too many objections, but please consider the viability of the points being made over and above the quantity of responses.<br><br>Thank you for taking the time to read and consider my submission. | Specifically with regard to hydrogen sulphide, the concentrations of sulphide observed in the treated effluent (2.4 micrograms per litre) from the pilot tests are very low, to the extent that normal activity of naturally occurring bacteria in the lake would be more likely to affect sulphide concentrations than the treated water from the plant.<br><br>Regarding the quality of recycled water, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ This means that there is no negative impact of recycled water either short term or long term.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper<br><br>Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature. |

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| | | The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>303Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP463 | I am writing to express my strong OPPOSITION to Southern Water's effluent recycling schemes. I wish for DEFRA to reject the plan and insist that Southern Water develops a more sustainable plan that puts local people and the environment before profit. Please don't let this company that has already done so much damage wreak further havoc. It's not what customers want, it's not what citizens want. Trust is so low in institutions and politicians, don't let this be another example where you let us down.<br><br>From the material I have considered, these are my objections:<br><br>Southern Water has a poor track record of treatment plant and pumping station failures, prosecutions for pollution incidents and failure to take prompt action to rectify problems, so how can they be trusted with complex technology that is required to treat final sewage effluent. At Havant, the risks of leachate being mobilised when constructing large tunnel shafts and hundreds of piles through the 13-metre deep contaminated landfill waste into the chalk aquifer below adjacent to Langstone Harbour are far too great.<br><br>While research shows that customers prefer more natural solutions such as reservoirs and aquifer storage, I feel these far simpler and more cost-effective solutions are being ignored because the funding mechanism incentivises infrastructure-heavy solutions instead of encouraging development of sustainable solutions. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding the site being a former landfill site, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

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| | We get plenty of free rain but only collect 1% of rainfall in the UK, when collecting and storing more water in new reservoirs and confined aquifers for use in dry summers will also help reduce the forecast increase in flooding, provide recreational sites for our communities and boost biodiversity.<br><br>Meanwhile, millions of litres of water that Southern Water customers have paid to treat are lost every day to leakage in the distribution network. Without a faster programme of replacing the ageing pipe network, Southern Water will let leakage continue while wilfully pursuing the most environmentally damaging option. The Hampshire and Littlehampton effluent recycling schemes have the highest negative environmental impact score of any of the options considered. The energy alone for the Hampshire scheme will cost £3 million per year. Choosing such a carbon intensive solution, both in the construction and the emissions from operations is madness when we're facing the rapidly developing climate crisis.<br><br>Please put people and our planet ahead of profit. This isn't how it should be. | Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Regarding the collection of rain water, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We introduced our Water Saving Audit Programme in April 2024 to help businesses reduce water consumption and save money off their bill by offering a tailored solution depending on their industry and line of work.<br><br>Our audits generally include fixing leaky loos, taps, showers etc. and/or fitting water-efficient devices as well as recommending other water efficiency improvements your business can make such as rainwater harvesting.<br><br>The audit (and the fixes) are free and we've partnered with the charity Groundwork to deliver this initiative.<br><br>More information here https://www.southernwater.co.uk/save-a-little-water/water-saving-audits/<br><br>We aim to replace all our existing household and non-household (industry) water meters with smart meters during AMP8 (2025-2030). Given the challenges we face in the Central area, we have prioritised Sussex North WRZ and Sussex Brighton WRZ for roll-out of the smart metering programme for household customers.<br><br>We are also reviewing an accelerated programme of non-household demand management in Sussex North WRZ to reduce industry and agriculture water consumption.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and |

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| | | Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |

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| | | Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. |
| WRMP467 | I am an applied aquatic biology postgraduate, a recipient of Southern Water's water services and a resident of the Isle of Wight, and I believe this new plan constitutes a great potential risk to both public and environmental health, that is also incredibly illogical and convoluted from a | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding effects of recycled water on local ecology, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is |

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| | development perspective, with the attached potential for great public disruption and expenditure, and I am pleading for its rejection.<br><br>The impracticality of Southern Water's proposed plan and its disproportionate economic and environmental costs Southern Water's proposed management plan intends to address water deficits through methods which are extremely energy costly: desalination, effluent recycling, massive invasive pipeline construction, and even shipping water from Norway in certain cases.<br><br>These high infrastructure solutions represent massive development and operation costs that the government will likely have to subsidise, and that Southern Water customers will certainly face the financial cost of. All of these methods have a high carbon impact and produce huge greenhouse emissions, which will only exacerbate the climate change problem currently impacting ongoing water availability. Especially considering the complexity associated with implementing these plans (in planning/approval and execution) which will invariably prolong projected timelines, increasing total effort/energy/cost expended.<br><br>A potential risk to public health alongside inadequate communication to residents and customers<br><br>It is completely unknown what the water quality impact of this effluent recycling will be and Southern Water has not adequately consulted their customers (myself included) about processed/recycled effluent being fed into water reservoirs and consumed. Reclaimed water is<br><br>I see that Southern Water has outlined similar plans for the Isle of Wight, very close to where I live, in fact, and I am made incredibly uncomfortable by the thought. I know of many others who would be too, had they been given the luxury of being informed of these proposed developments.<br><br>Especially given that these plans indicate crossing through (and developing on) old landfill sites, which risks massive contamination of the water supply and surrounding ecosystems, the complete long-term public health effects of, we cannot even conceive.<br><br>What the research says<br><br>This report indicates that current UK wastewater treatment procedures still allow too much faecal contamination into the water supply, presenting a viable threat to public health: https://raeng.org.uk/news/new-report-urges-upgrades-in-wastewater-infrastructure-to-protect-public-health<br><br>This meta-analysis found the Hepatitis A risk associated with 'treated wastewater' is 15%, compared to a 0.3% risk associated with regular drinking water: https://pmc.ncbi.nlm.nih.gov/articles/PMC9859052/ | the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Desalination is an energy intensive process. However, the drawbacks of any option have to considered in view of the benefits it delivers. We have excluded desalination options in cases where drawbacks outweigh benefits or where the environmental challenges cannot be satisfactorily overcome.<br><br>The potential environmental impacts associated with desalination plants were a key reason for the desalination option in Southampton to be replaced. However, some of the environmental impacts are location dependent there are cases where these impacts can be mitigated to acceptable levels. We have submitted a research proposal to the Ofwat Innovation fund to investigate ways to reduce the environmental impacts of desalination plants.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. Sea tankering from Norway is no longer included in our plan.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding planning approval, the WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat |

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| | In this study, groundwater sources in areas surrounding landfill sites were contaminated by landfill leachate (including heavy metals) to the point it constituted a viable threat to public health: https://pmc.ncbi.nlm.nih.gov/articles/PMC3561079/<br><br>In this study, populations in China that were more regularly exposed to reclaimed water experienced greater occurences of Legionella infection, indicating a potential threat to public health: https://link.springer.com/article/10.1007/s11783-021-1516-1<br><br>This study identified fish living in reservoirs containing wastewater experienced affected nervous systems, indicating the potentially serious long-term effects associated with effluent that are not yet fully understood:<br>https://www.sciencedirect.com/science/article/pii/S0043135417310126<br><br>My conclusion<br>Altogether, the science literature paints a picture of a treatment practice that has not yet been mastered in the UK, that has us drinking increased amounts of faecal matter even when the treatment process functions within expectations, and a treatment process that also risks massively harming public health whenever/wherever that process fails.<br><br>It seems extremely unwise to proceed with such a controversial course of action that risks the public health to such an extent while costing exorbitant amounts of money and requiring exceptional amounts of infrastructure construction alongside extensive/impractical logistical considerations. | and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1176 responses as part of rdWRMP24 consultation.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. We do not have any evidence to suggest that the risk of Legionella is any higher than in other drinking water supplies. |

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| | | Southern Water teams continue to work with a wide variety of regulatory organisations (Environment Agency, Natural England, Ofwat, Defra, Drinking Water Inspectorate), District Councils, County Councils, NGO's (e.g. RSPB, Wildlife Trusts, National Trust) and local community groups on project planning and our 5-year plans.<br><br>Alongside our statutory duty to consult the general public on our Plans, we consult with local residents on an individual scheme basis to ensure we consider local issues in our work. As an example, we will be consulting local residents on the Isle of Wight in early 2025 in preparation of a planning application for our proposed water recycling project in Sandown.<br><br>More information can be found on our Customer Engagement web pages Stakeholder Insight - Southern Water<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We can confirm further details as follows.<br><br>• The outcomes of the site selection for the Water Recycling Plant (WRP) were initially presented at the Summer 2022 Consultation, and a further review of the site selection was presented at the Summer 2024 Consultation.<br>• The site selection has been based on identifying a site within a 1.5km boundary from Portsmouth Harbour Wastewater Treatment Works, to minimise pipeline lengths and the distance that treated wastewater would need to be transferred. Within this 1.5km boundary a total of 26 sites have been considered. These sites were reviewed against a range of environmental, planning, engineering, and construction criteria to identify a site that minimises impacts on the environment as far as possible, whilst ensuring the WRP could be delivered appropriately. This included reviewing the presence of historic landfill sites and known potential sources of contamination.<br>• At this stage, it was anticipated that mitigation measures could be implemented to reduce any adverse effects to an acceptable level, and bespoke details would be developed depending on the site selected. A number of the sites considered were identified to have risks associated with historic landfill and ground contamination; as much of the area around Portsmouth Harbour Wastewater Treatment works is reclaimed land that has been filled with waste.<br>• The remediation strategy will include a suite of recommended mitigation measures against the potential risks to human health, built environment, surface water and groundwater receptors for example construction methodologies that reduce new pathways e.g. continuous flight auger piles. These measures are robust, routinely utilised |

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| | | during brownfield development and are typically either industry common/good practice, or are required under the various legislative regimes relating to control of construction works.<br>• The outcomes of the site selection process presented at both the Summer 2022 and Summer 2024 Consultations resulted in the identification of the preferred site against the criteria that were considered. The other sites considered were not preferred for the various reasons including:<br>○ Risks due to proximity or connectivity to sensitive biodiversity and environmental designations associated with Langstone Harbour and the Solent<br>○ Risk of flooding<br>○ Loss of public open space within Havant<br>○ Landscape and visual impacts, including the Chichester Harbour National Landscape designation<br>○ Proximity to residential development<br>○ Physical constraints such as access restrictions or challenging topography<br>○ Presence of existing business premises<br>• The initial site selection only considered undeveloped land, however following engagement with Havant Borough Council, several additional sites were identified on existing employment developments. These sites performed better against the environmental criteria, however they performed worse against the planning and engineering criteria, because development of the WRP on these sites would require the demolition of the existing employment development which would displace businesses and jobs.<br>• A land availability and best value review was also undertaken prior to the Summer 2024 Consultation on the shortlisted brownfield sites. This took into account various costs, including those associated with delivering the Water Recycling Plant at the site, mitigation of environmental effects, and the pipeline connections to Havant Thicket Reservoir and Portsmouth Harbour Wastewater Treatment Works. Out of the sites that were considered to be suitable, the selected site performed the best as it was undeveloped and required no removal of existing businesses and employment development.<br><br>Regarding the use in the UK, the advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>As set out in our 2023-24 annual report water quality compliance at our reservoirs is currently at 99.9%. We strive to improve this and are regulated by the Drinking Water Inspectorate (www.dwi.gov.uk ) |
| WRMP468 | I am writing about Southern Water's proposal to recycle sewage for drinking water at Havant. I believe Defra has already rejected the scheme once, and I hope they will do so again. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | It seems the lifespan of this project will only be 60 years, a longer term sustainable plan should be put in place.<br><br>There are numerous environmental concerns, from the miles of disruptive pipeline needing to run through fields and forests, to use of a brownfield site for the reservoir, risking leakage of chemicals into natural water springs. These sit alongside research showing that the carbon impact of the scheme would be very high compared to other water supply options.<br><br>There is a huge amount of detailed and professional information here, to back up the concerns of many local people:<br>https://havantmatters.org/water/wrmp2024/<br><br>Huge volumes of water leak from southern water pipes currently, which if a proper system of maintenance and repair was in place, would save vast tonnes of water annually. This should be prioritised.<br><br>I understand many people have previously objected to the scheme. I don't think anyone wants to drink treated sewage! If allowed, it will likely become the norm, not an emergency measure, especially as general maintenance and improvement and management of the water network seems to be so poor.<br><br>It seems the water companies in general are getting away with lining their own pockets, whilst raising customer bills, and without having a long-term, sustainable, environmental, model for running the water system in place.<br><br>I hope Defra will review the options with the impact on the environment and local people in mind. | Chapters 4 and 5 of our main WRMP describe our plan from 2025 to 2075. This plan takes a long-term view. However, uncertainties related to both demand for water and supplies of water increase the further into the future we forecast. As a result, we adopt an adaptive planning approach. We explain what adaptive planning is in section 5.5.1 of the main WRMP and provide more details in Chapter 9 of the main plan and in Annex 21.<br><br>Regarding the environmental impacts, our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. In regard to the location, SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for |

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| | | the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>Regarding leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>Concerning customer bills, the way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is the case for HWTWRP.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. The PR24 Proce Review for Southern Water is currently being re-determined by the CMA. This process will be complete by March 2026. |

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| | | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding the impact on local people, alongside our statutory duty to consult the general public on our Plans, we consult with local residents on an individual scheme basis to ensure we consider local issues in our work. As an example, we will be consulting local residents on the Isle of Wight in early 2025 in preparation of a planning application for our proposed water recycling project in Sandown.<br><br>More information can be found on our Customer Engagement web pages: Stakeholder Insight - Southern Water. |
| WRMP469 | My wife and I are customers of Portsmouth Water and the proposal to use effluent recycling will directly affect us. When the new reservoir is used, we would receive the recycled effluent, initially in a drought or emergency, but more routinely from 2040.<br><br>We have the following comments over Southern Water's latest Draft Water Resources Management Plan:<br>A) We have grave reservations about the competence and financial stability of Southern Water. We doubt it could create and operate its water/effluent recycling in such a manner that it would not encounter leaks and/or effluent contamination of the water supply to households or into the wider environment.<br>B) We are concerned that its reliance on water/effluent recycling is not the best environmental option<br>C) Due to its location adjoining Langstone Harbour, a Site of Special Scientific Interest, we believe that there are significant environmental risks associated with building a Waste Water treatment site at Broadmarsh, and transfer pipeline to [redacted].<br><br>A. Southern Water's competence and financial stability<br>Southern Water has a very poor record on sewage discharges and leaking pipework/sewers. It currently leaks 19% of all the water abstracted from the environment, which we as customers pay to treat. Even by 2050 it still plans to be leaking about 10% of all the treated water, including the new water manufactured at huge cost from the planned new effluent recycling schemes. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>A) Regarding any potential contamination, Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Regarding leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Our regulators the EA, NE and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the plan, including the options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it. |

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| | In 2021 Southern Water was fined a record £90 million for dumping sewage in the sea between 2010 and 2015. More recently it has caused huge disruption in Portsmouth with a string of sewer leaks on the Eastern Road A2030, one of only 3 arterial routes into the city.<br><br>As a result, we have no confidence that Southern Water will not leak effluent into a pristine, chalk fed reservoir.<br><br>Southern Water is also widely reported as being in financial trouble and at risk of defaulting on its debt, with S&P reducing its rating following a £300m bond issue at an excessive 7.75% interest.<br><br>B. Reliance on Water/Effluent Recycling<br>Southern Water has placed its emphasis on what it terms Water Recycling which, in reality, means recycling effluent. This is a high energy use solution just to treat the effluent water up to drinking water, or near drinking water standards. This water will be routed to reservoir storage or back into rivers, for later abstraction, meaning that it will require a second treatment to bring it back to drinking water standards. On top of this, pumping costs need to be added to water storage and/or transfer. In particular the cost of pumping around 90m litres a day over 40km from Havant Thicket reservoir to [redacted] would be substantial.<br>Climate change suggests that we will get warmer, wetter winters. This additional rain could be stored and used without the high cost and treatment proposed. Storage solutions do have an initial cost, but last well over 100 years as opposed to water recycling with additional ongoing equipment replacement costs etc. Southern Water seems to have rejected most other options with little or inadequate analysis, putting their reliance on a high cost, high energy, high risk solution.<br>Previous consultations around De-salination were not favourable, but incur most of the same disadvantages now being proposed: Initial and ongoing cost, pipeline construction and pumping cost, and the environmental effects of concentrated brine/effluent stream being discharged into the Solent.<br><br>C. Environmental Risks of Building Waste Water Treatment Plant at Broadmarsh and Long Distance Pipeline to [redacted]<br>We believe that there are significant risks associated with developing the effluent recycling plant and the high lift pumping station on Broadmarsh. This is due to it previously being used as a landfill site with a vast array of contaminants, including ash from a former incinerator. Tunnelling and building on this site could cause release of contaminants into groundwater and/or Langstone Harbour as the tip was not lined.<br>We also believe that there is an environmental impact of Reject Stream concentration. Although the Reject Stream is treated wastewater, Southern Water states that the impurities will be at a much higher concentration and consequently may not be allowable under its current permit from the Environment Agency. We have grave concerns that this reject stream would cause environmental damage to the Solent and Langstone Harbour when discharged through the Long Sea Outfall. Southern Water's preliminary environmental information report states a likely significant effect on the marine environment. | The options and risks are assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders. They have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans.<br><br>B) We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Storage, such as reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We |

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| | Whilst we perfectly understand and agree with the desire to protect Hampshire chalk streams, we feel that a better solution could be found rather than creating an expensive and massive infrastructure project, using a 40Km pipeline to [redacted] with all of the environmental impact of construction, together with ongoing impact of high pumping costs between the sites. We do not feel that greener and cheaper alternatives are being investigated, such as moving water abstraction from the upper catchment of rivers to tidal limits, and aquifer storage.<br><br>Finally, we have been disappointed at the lack of publicity for yet another consultation concerning the same plans for water recycling, and that interested parties can only view documentation at the Southern Water headquarters in Worthing. | will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>C) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated.<br><br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we’re ensuring that environmental considerations inform the Project’s design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations<br><br>Regarding our engagement, our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We have received 1176 responses as part of rdWRMP24 consultation. |
| WRMP470 | I attended a local talk on SW (southern water) planning to recycle water locally. It raises concerns that there has not been local involvement or consultations with the community where this affects.<br><br>I object to SW plans for a local water recycling plant near Langstone Harbour<br>• SW (Southern water) has not considered other options to take into effect predicted climate change. There has been no consultation with their customers<br>• It does not seem a cost effective or necessary option to tanker water from Norway at times of drought. The cost to customers would be unrealistic to people who are already struggling to meet their domestic bills. This option also raises risk of importing species not consistent to local waters<br>• It seems SW has not acknowledged the ongoing Hampshire grid scheme, not taking into account the amount of water needed to meet the needs to all areas<br>• There is risk of high carbon impact and greenhouse gases if effluent recycling goes ahead<br>• There is high risk of leakage from waste dumps as SW plan to build on old sites which is a danger to the environment. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding consultation, there was extensive consultation, our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information. We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Sea tankering from Norway is no longer included in our plan. |

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| | They have not considered alternative local options which would be more cost effective, environmentally friendly and community based.<br>• Aquifer storage locations would allow water to be collected in winter and stored for use when needed but SW have not investigated this option in any detail.<br>• Additional Reservoirs would improve local community involvement and maintain natural wildlife in their normal habitat<br>• Moving water abstraction to the mouth of the rivers | In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>We have received 1176 responses as part of rdWRMP24 consultation.<br>• Regarding our options selection, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>• The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These costs are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to |

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| | | tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction.<br><br>• We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>• Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans.<br><br>• A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are |

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| | | more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. We will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning<br><br>• Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br>. |
| WRMP471 | I write to you as a disappointed and appalled member of the Havant Borough. The proposed plan by Southern Water is short-sighted and absurd in what it proposes.<br><br>The idea of importing water from Norway in a country where we see more and more rainfall is a uneconomical and environmentally-damaging solution. The investment into the infrastructure we already have is surely the most efficient and long-standing solution. Merely adopting the same approach we all would in our homes prevention and resolution is always better than a “patch-job” which this plan appears to be.<br><br>The most logical long-term solutions surely would be:<br>• Repairing the multiple leaks in the SW network, which account for 10% of treated water loss<br>• Increasing storage facility for rainwater from wet periods to use in the Summer, both at the treatment level but also for individual households with rainwater butts provision<br>• Upgrades to the networks, in anticipation of inevitable population growth and climate change<br><br>Given we do not live in a water-poor country, the way Southern Water manage water treatment is shocking - particularly with the environmental impact on the local water with all of the drops. It is simply not good enough, and everyone should be invested in better long-term solutions, not just profits. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>• Regarding investing in our infrastructure and leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward<br><br>• On more rainfall storage, the amount of water we can abstract is constrained by climate change impacts and reductions to river abstraction. Reducing abstraction from rivers is part of the Government’s 25-year Environment Improvement Plan and you can read more about how we are trying to protect the River Test in our Drainage and Wastewater Management Plan (DWMP) for the Test and Itchen River Basin Catchment. Moreover, climate change is pivotal to much of the work we are doing.<br><br>As stated in the Government’s policy paper Water abstraction plan: Environment - GOV.UK “A changing climate is likely to bring greater variability in rainfall and higher temperatures. We expect less groundwater recharge and larger seasonal variations in river flow as well as changes to when and how extended dry periods occur. Sustainably abstracted water bodies will be more resilient to changes in climate and drought pressures so addressing unsustainable abstraction will help improve resilience to climate change.” |

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| | | On increasing reservoir storage, we have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage).<br><br>Furthermore, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding our network, we have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Chapters 4 and 5 of our main WRMP describe our plan from 2025 to 2075. This plan takes a long-term view. However, uncertainties related to both demand for water and supplies of water increase the further into the future we forecast. As a result, we adopt an adaptive planning approach. We explain what adaptive planning is in section 5.5.1 of the main WRMP and provide more details in Chapter 9 of the main plan and in Annex 21.<br><br>Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017.<br><br>The £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>On the idea of importing water from Norway, this option is no longer included in our plan. |

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| WRMP472 | In response to the revised water resources management plan proposed by Southern Water, I strongly wish that Southern Water would take a more realistic view of the water resources position and produce a more sustainable water management plan.<br><br>I would urge them:<br><br>1. to abandon, altogether, the effluent recycling scheme, an abhorrent, environmentally damaging and extremely costly plan.<br><br>2. to abandon, also, such stop-gap, expensive and environmentally damaging measures such as the ridiculous idea of bringing tanker loads of water from Norway.<br><br>Instead, I would suggest that:<br><br>A. An intense programme of repairing and stopping leaks should be prioritised. It seems a very poor plan to merely reduce leakage by 53% by 2050.<br><br>B. Our precious chalk streams and rivers should be guarded and protected, instead of them being robbed and polluted.<br><br>C. The capture and storage of our prodigious winter rainfall should take precedence, which in turn would thereby reduce disastrous flooding.<br><br>D. Schemes to increase water storage capacity at existing works should be prioritised.<br><br>E. The idea of a free water butt scheme for customers, as trialled in the Isle of Wight, is admirable. Everyone could do a little more to conserve the water supply.<br><br>Finally, the effluent recycling scheme cannot represent the best value for customers. It would be exceedingly expensive. There are many ways, some of which are mentioned above, of using those costs in a far better, more environmentally satisfactory way, instead of in one which is wholly repugnant. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) We note the objection to the use of recycled water in Havant Thicket.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor.<br><br>We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. In addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. We recognise that carbon may be significant from this option however, due to the required transport methods and temporary nature of the option. We will continue to assess the carbon footprint of this option and balance it against the environmental benefit of protecting the River Test in times of drought.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are |

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| | | taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>2) Sea tankering water from Norway is no longer included in our plan.<br><br>A) Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period.<br><br>We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>B) All our water supply options are continually appraised as part of our adaptive planning process and sea tankering was one water supply option being considered but this option is no longer included in our plan.<br><br>C) Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>D) Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The HWTWRP scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>E) We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | | Regarding the quantification of cost and value for money, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>You can find out more about our carbon policy here:<br>https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/ |
| WRMP473 | A number of concerns have been raised commenting upon the lack of trust the consumers of Portsmouth Water have on being able to control the quality of their water supply should the opportunity of Southern Water be given to add processed sewage to the Havant reservoir. As Southern Water are a major stake holder in the construction of the reservoir the decision on the quality of the water added to the reservoir might not be that of Portsmouth Water.<br><br>In the event of a failure in the processing of the sewage by Southern Water resulting in fowled water entering the reservoir,<br><br>1. What back up source of water will be available for customers,<br>For how long will the back up be available, and<br>2. How will the fouled reservoir water be processed.<br>and<br>3. How long before a normal supply is restored,<br><br>The publics Trust in Southern Water is severely tarnished over the years by its inability to run a successful sewage processing system. I am one of those potentially impacted by this possible scenario. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1, 2 & 3) Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We deliver our capital programmes in line with regulatory commitments and operational needs. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | Thanks for the opportunity to record my concerns . | We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP474 | I am submitting this email to object to the Southern Water Resources Management Plan. Please note the following objections:<br>1. Levels of pollution of Langstone Harbour exiting the sewage outfall pipe should be reduced to protect this environment. The Southern Water sewage recycling plan would increase levels of dangerous pollutants from the 1960's landfill site where the recycling plant will be built. It will also lead to more concentrated sewage being pumped out into Langstone Harbour. I am one of the last residents in this area to swim in Langstone Harbour. It is unacceptable to put people at risk in this way.<br>2. Havant Thicket reservoir was originally planned to collect water via chalk fed natural sources and supplied to Hampshire residents such as myself for drinking. Southern Water intends to pump water recovered from sewage into this reservoir. With their record of fines for pollution they cannot be trusted to safely recycle sewage water into this reservoir. We need to collect more rainwater and store it in new reservoirs like Havant Thicket and not pump recycled water into this reservoir. The change of use for this reservoir from that originally devised by Portsmouth Water as approved on that basis by Havant Borough Council should nor be allowed.<br>3. Southern Water will make more profit by building unnecessary infrastructure than by collecting more water from natural sources e.g. abstracting water closer to the tidal zone in this coastal area. The new Labour government should block this and change the funding model which encourages water companies to do this.<br>4. This is not an energy efficient way to supply water in this area. Stored water in Havant Thicket reservoir should be allowed to flow downhill to supply the coastal population and not pumped uphill back into the reservoir in the form of recycled sewage. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>2) We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>3) Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company |

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| | | can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>4) Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP475 | I am sending this email to object the Southern Water revised draft Water Resources Management Plan.<br>A key part of this plan is to take effluent from Budd's farm sewage works, build a treatment plant on a former landfill site next to the coast at Broadmarsh, transfer the treated water uphill to be stored in Havant Thicket Reservoir and to pump the residual concentrated effluent into Langstone Harbour via an already inadequate outfall pipe which allows pollution to come in with the tidal flow rather than going into the open sea in the Solent.<br>This involves Portsmouth Water building the dam at the southern end of Havant Thicket Reservoir with a dual pipeline which will allow Sothern Water to pump their recycled water from the coast up into the reservoir for storage and further treatment. This change of use for Havant Thicket reservoir should not be allowed by DEFRA. The original project was approved by Havant Borough Council because it was designed to be fed by rainwater filtered though chalk and allowed distribution of water downhill to supply drinking water to the more urban coastal population. This scheme was energy efficient and designed to be in harmony with the environment in this area. Southern Water should not be allowed to turn this proposal on it's head by using an energy intensive scheme to recycle water recovered from sewage using reverse osmosis and pumping it uphill to Havant Thicket Reservoir radically changing it's use | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |

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| | from that originally proposed. Further Environmental pollution of Langstone Harbour resulting from this scheme should also not be allowed. | Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. |
| WRMP476 | It is clear that very significant research work, analysis and consultation has been carried out by organisations, which include scientific, conservationists, ecolistic, water supply experts and of course financial organisations into the basic problem we have that our climate is changing and more and more of the population what to live on the south cost of England, all with their various objectives. The only thing they have in common, is that we will require more drinking water as we move further into the future.<br><br>However, the most comprehensive and thoroughly researched and presented document I have read is the review of Southern Waters 'Ware Resources and Management Plan' which exposes the reality of the poor plan presented by Southern Water. Now I am not an expert of any of this and personally do not need to be to that SW only real concern is making more money from a project which overriding concern should be the provision of clean, high quality water to their area of responsibility. Sadly, even I can see the project is flawed, driven by profit and will actually do more damage to our area supply area, and positively beyond.<br><br>Full email……<br><br>It is clear that very significant research work, analysis and consultation has been carried out by organisations, which include scientific, conservationists, ecolistic, water supply experts and of course financial organisations into the basic problem we have that our climate is changing and more and more of the population what to live on the south cost of England, all with their various | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding climate change, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. |

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| | objectives. The only thing they have in common, is that we will require more drinking water as we move further into the future.<br><br>However, the most comprehensive and thoroughly researched and presented document I have read is the review of Southern Waters 'Water Resources and Management Plan' which exposes the reality of the poor and wrongly thought through plan presented by Southern Water. Now I am not an expert on much of detail on this and personally do not need to be to see that SW only real concern is making more money from a project which overriding concern should be the provision of clean, high quality water to their area of responsibility. Sadly, even I can see the project is flawed, driven only by profit and will actually do more damage to our supply area and, positively beyond.<br><br>While the report provides much evidence that SW's approach is badly thought through, conversely, the review puts forward a much simpler approach to the problem which would use nature rather than chemicals and disruption to the existing environment as a basis for their proposed solution. Basically, we need more water storage provided by aqafers and reservoirs so that during winter when water is more plentiful it can be naturally stored and moved to drier regions if and when necessary via a network which apparently is not of interest to Southern. Further, Southern should invest in the repair of leaks which account for the huge amount of clean water which is effectively just 'thrown away' each day. (See latest figures in the report. Existing and the installation of new waste infrastructure at sewage stations and pipelines could, and at reasonable cost to SW be upgraded to allow much more natural rainwater to be captured and processed instead of allowing it to be just disposed of into the sea.<br><br>Given all these opportunities to capture and conserve water at a much lower cost than chemical approaches which are open to SW, why does SW want to send even more money, (which they do not have) and at a huge rise in the cost to its customers, on new untried approaches which have never been used before in the U.K. with its unique climate and geography? It just not make sense! And who and why would anyone, investors or customers trust a company like SW with such a terrible history of managing the infrastructure they already have, with another huge project while they can't even manage what they already have, the need to pump 10,000's of litres of untreated into Chichester Harbour each while still incurring the financial losses they make everyday.<br><br>Please stop this project now before Southern Water spend even more money on this project and insist they fix the problems they already and implement some of the more sensible and nature based options open to them. | The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In the business plan submitted in 2024 for the 2025 to 2030 five-year regulatory period, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. We are confident that when the Competition and Markets Authority (CMA) makes its PR24 determination it will provide sufficient funding for the investment in the 2025-2030 period.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental |

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| | | sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations |
| WRMP477 | I am a resident of Hayling Island who is writing to express my deep concerns over and strong opposition to Southern Water's effluent recycling plan. I implore you to use your powers to reject it and require Southern Water to develop a more sustainable plan that works with climate change and puts the environment before profit. I ask too that you reform our approach to how we manage water resources in the future.<br><br>I have outlined below my main objections to Southern Water's proposed effluent recycling scheme and the facts as I understand them.<br>• Why is change required: Climate change means that wetter winters and drier summers are predicted for the future. Our population is also likely to grow. We will require more water. Currently, we only collect 1% of rainfall in the UK and Southern Water loses 100 million litres of water every day to leaks, so the provision we have is inadequate to meet predicted needs. Southern Water's abstraction licence requires them to reduce the amount they are taking from [redacted]. I understand that this is a significant factor driving Southern Water to claim that we need the effluent recycling scheme instead.<br>• What solutions would address the problem: We could build new reservoirs and use underground confined aquifers to collect more water; whilst also increasing efforts to maintain | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>• The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | our existing systems and repair leaks. (The statistics above demonstrate how shockingly we perform in these areas at the moment.) We could develop storage closer to where water is required to reduce infrastructure and environmental impact and help to reduce the forecasted increase in flooding, provide recreational sites for our communities and - if we build more reservoirs - provide biodiversity opportunities. We could move abstraction too.<br>• A former Managing Director from Southern Water believes that if you move abstraction on the River Test and River Itchen to the tidal limit (i.e. the end of the freshwater river) the whole of the freshwater section of the river would be protected from abstraction, which would restore natural flows, including in a drought. He does not support effluent recycling and believes this solution alone would solve the problem. If this change were implemented, there would therefore no longer be any need for the effluent recycling scheme. (Reduction of flows into the estuary is supported by the EU Water Framework Directive. Consumers would still be getting river water, which would also reduce the risk of rejection - please see below *)<br>• Southern Water could potentially implement this change quite simply and quickly. It would require a new (9km) pipeline in a tunnel to get the water from the tidal limit to [redacted]. Alternatively, the water could travel 1km to Portsmouth Water's [redacted] works on the River Itchen, which is already close to the tidal limit. This is vastly less infrastructure than that required for the effluent recycling scheme.<br>• There would be no change to the situation for the estuary because the amount of freshwater flowing downstream past the new abstraction would be unchanged. This would remove the pressure for abstraction licence reform to reduce the amount Southern Water can take from [redacted], as there would no longer be an impact on the freshwater section of the river.<br>• For the Itchen, moving abstraction to the tidal limit would protect 12 km (7.5 miles) of the river and the Itchen navigation from abstraction, which would also be of massive benefit to the environment.<br>• What are the disadvantages to the proposed effluent recycling scheme:<br>• As a Nationally Significant Infrastructure Project, the effluent recycling scheme would deliver huge financial benefits to Southern Water and its stakeholders (c£45 million in profit). However, for the environment and everyone else, including consumers, I can see only 'negatives'.<br>• This project would involve a vast amount of energy and investment (both initially and in the future to maintain it and retain the skilled personnel who would need to operate it). It would also require reliance on another country were we to ship water from Norway. The recent energy crisis has demonstrated that such a strategy comes with considerable risks. All this would be at a time when many consumers are struggling financially and we are supposedly striving to reduce our carbon footprint and national emissions, a time of energy emergency. Cop29 is currently considering how developed nations can support developing nations who are being encouraged to reduce their carbon footprint and here a major water company is apparently advocating a scheme which would increase ours! I do not wish this to be done in my country or in my name, especially given the sustainable, more environmentally responsible alternatives that are available.<br>• There would be large-scale disruption to and destruction of natural habitats due to the scheme, including new treatment works, bore holes and vast pipelines (e.g. a 40km pipeline to | • Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>• We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>• See reply to point 3 regarding moving the abstraction point<br><br>• Our regulators the EA, NE and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the plan, including the options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it.<br><br>The options and risks are assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process.<br><br>• The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business |

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| | [redacted], another 30km pipeline to provide additional supplies from the reservoir to the West Sussex area, which is not on the published plan, pipes to pump water 90m from [redacted] up to Portsdown Hill in Portsmouth).<br>• There would be risks of leachate because of the location of the proposed processing plant at Broadmarsh. Here there are risks associated with drilling down many meters into what was previously a landfill site with no engineered lining. If all other considerations are somehow put aside and the scheme were to be accepted, it is vital that Southern Water are required to find an alternative location for the recycling plant at Havant, to avoid these significant risks.<br>• There is a risk too of reservoir overflow into the Hermitage streams, which has not even been modelled yet, so cannot be properly taken into account.<br>• Fill material will contain solvents and hydro carbons which are easily mobilised in groundwater and could pass out into the harbour.<br>• There will be massive financial costs to be passed on to the consumer: £3 million per year to provide the energy alone for the Hampshire Scheme, without the construction and maintenance costs for all the required infrastructure and specialised processes. The projected costs are spiralling all the time and have increased by millions already this year. Why should consumers have to pay for such a scheme when surveys show they don't want it; and perfectly viable and more sustainable solutions are available instead, but have not been publicised or consulted on?<br>• The scheme is unsustainable: I believe the membranes used in the reverse osmosis process to recycle the effluent would be similar to those at the desalination facility on the Thames, which are difficult and costly to maintain; and have broken down. The effluent recycling infrastructure would last for 60 years, after which it would have to be replaced. This is not a responsible option. It leaves no legacy for the future. We need sustainable solutions. They exist but are not being given due weight and proper consideration.<br>• Safety and accountability: There is no requirement to have independent monitoring of the reservoir or 'finished products' i.e. the recycled and wastewater. Portsmouth Water, who own the reservoir, will rely on Southern Water for analysis and maintenance. Contaminants would still remain in the water after it has been treated and in the concentrated wastewater that would be pumped into the sea via the outfall in the Solent. For every 80 mega litres of water processed, 20 mega litres will be ejected via the long-sea outfall. The brine will be warm. How can this fail to have an effect on the marine ecology - and, ultimately, us!? Ecoli is already discharged from the existing outfall. What evidence is there to show the new discharge would be safe or monitored and managed? Is there a risk to ecology in the reservoir itself linked to the water quality? This is technology that is untested for use in this way. Models showing a 72 hour cycle (based on publicly available data) show that the waste from the outfall would circulate around an area that would include a large part of the Solent coastline and the ecologically important and sensitive area of Chichester Harbour. We would risk the loss of unique biodiversity in the area, together with leisure and tourist facilities. There would be a risk too in respect of contamination of our spring-fed reservoir.<br>• Quite apart from the financial cost and the carbon emissions involved, if water were to be shipped in from Norway at times of drought (an idea which Southern Water themselves had initially dismissed), non native species could be introduced to our water supply, with unknown consequences. Are there plans to take account of and mitigate against this? | plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>• Concerning the carbon impact, water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |

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| | • Reliability: Southern Water would effectively be 'self policing' if this scheme went ahead e.g. water testing at the reservoir at Havant Thicket would only have to take place once a month, by which time any contaminants would already have passed into the drinking water supplied to the local population. How can that be allowed? How is that acceptable? Can Southern Water be relied upon to operate this vast and new operation safely? Its track record of breaches and fines with existing technology is shocking. As it has been shown unequivocally that Southern Water cannot be trusted to operate and maintain its current traditional infrastructure without causing pollution, what hope is there of it safely operating the complex advanced effluent recycling treatment technology without incident?<br>• Carbon neutral aims: How can Southern Water say they are aiming to be carbon-neutral by 2030, yet at the same time propose this scheme that will require such huge amounts of energy? * Water from effluent recycling would taste different to what we have currently. This and concerns about the reliability and oversight of the recycling process could lead to mass consumption of bottled water if our future tap water is not trusted or liked. How is that environmentally responsible? How does that support a vision of being carbon-neutral?<br>• The effluent recycling is supposedly a scheme that would address supply shortages in drought situations. However, it is misleading to think of it as operating only at those times. In order to maintain the system, it would have to run for 365 days a year for the water and pipes to remain 'sweet'. (12 Olympic size pools of water would be required every day. This is not sustainable.)<br>• Lack of equal consideration given to viable alternatives: Despite having originally undertaken to do so, Southern Water have not contacted their consumers directly to give them 'the full picture' and an opportunity to be properly informed about all the options. They have not taken the chance to show themselves to be transparent and open to debate by supplying information regarding alternatives to the effluent recycling proposals. Why would they have changed their mind about contacting their customers directly? There would have been no additional costs involved; the information was to have been included in Portsmouth Water billing communications. It's hard not to feel cynical and conclude that they did not wish consumers to have the information provided to them in this way because (i) they did not wish them to have easy access to it and (ii) they anticipated an unfavourable response to their effluent recycling proposal - which, in fact, was the case when it was considered - and rejected - in its first iteration. I feel that this further undermines trust in Southern Water as a whole.<br>• The future - we need a completely new approach: We need change and for government to be more actively involved. We need to: ensure our water resources are planned in a more sustainable way i.e. government to make more challenging leakage reduction targets and require a drastic increase in mains replacement programmes, amend abstraction licences, develop variable tariffs that reward those who conserve resources, legislate and update guidance so that the environment is put before profit e.g. by changing water company funding to stop incentivising water companies to develop infrastructure heavy solutions but instead be able to profit from and make a strong business case for making repairs and investing in maintenance so that this becomes a much more attractive option to investors.<br>Water is such a vital resource that affects us all. The measures that get taken forward as a result of this consultation will have far-reaching consequences, not just for us and our local | Sea tankering from Norway is no longer included in our plan.<br><br>• The majority of the pipelines will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>• Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we’re ensuring that environmental considerations inform the Project’s design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>• Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>• Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The |

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| | environment, but nationally and, potentially, globally. I find it hard to emphasise how deeply alarmed I am and how very strongly opposed to Southern Water's effluent recycling proposal.<br><br>Thank you for considering my views. | Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br>• A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10-20 years of the electrical and mechanical plant.<br><br>• The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>• We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>• Please see point 9 regarding the carbon impact.<br><br>• Please see point 9 regarding the carbon and energy.<br><br>• We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans. |

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| | | Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We have received 1,176 responses as part of rdWRMP24 consultation. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an |

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| | | option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>• The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>As mentioned above, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. |
| WRMP478 | As a long time resident of Hayling Island iam concerned about the quality of our tap water. In fact I now buy bottled water for drinking. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>As set out in our 2023-24 annual report water quality compliance at our reservoirs is currently at 99.9%. We strive to improve this and are regulated by the Drinking Water Inspectorate (www.dwi.gov.uk).<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP479 | I strongly object to the revised draft Water Resources Management Plan put forward by Southern Water. I am extremely disappointed that the revised plan is extremely similar to the previous plan that was rejected. This shows that Southern Water are not prepared to seriously consider other options which would be more sustainable and more environmentally friendly. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>• Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water |

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| | I do not support the Hampshire effluent recycling via Havant Thicket reservoir for the following reasons:<br><br>• It will affect the quality of the water in the reservoir (particularly given that Southern Water have no plans to identify and improve the management of risks in the sewage catchment area).<br><br>• Even with treatment not all contaminants can be removed, so the reservoir will get contaminated.<br><br>• I am also concerned about the impact of the scheme on people's perception of tap water and the likelihood of people changing to bottled water instead. This has many negative environmental impacts (e.g. increased plastic use, and problems with disposing of the bottles) as well as the cost implications of having to pay extra for bottled water which will impact the most on the poorer members of our society.<br><br>• As a Portsmouth Water customer I do not want the spring water in the reservoir being contaminated, and I am worried about the significant change in water composition in the reservoir.<br><br>• Concentrated reject water going into the Solent is also a significant concern.<br><br>• As a Southern Water customer I do not want the significant extra costs on my bill that will come with this effluent recycling scheme.<br><br>• The lack of legacy for this scheme makes it much less desirable than other options like aquifers and reservoirs for storing rain water which would have a legacy.<br><br>• Southern Water have a poor record of behaviour resulting in fines, and therefore cannot be trusted with an effluent recycling scheme (especially as there are no plans for independent monitoring). There would also need to be improved controls and monitoring in the sewer catchment.<br><br>I am also disgusted that Southern Water would be allowed to make a profit out of the new infrastructure schemes – they are clearly putting profit ahead of sustainability. They are also not listening to their customers (despite their claims that they do).<br><br>Tankering in water from Norway is a ridiculous idea. It will be expensive, bad for the environment (e.g. emissions from sailing all those miles), and risks introducing non-native species. There could also be water quality issues. Southern Water themselves have previously rejected this option, so why have they put it back on the table? | released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>• The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>• Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>• The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>• Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>• Sea tankering from Norway is no longer included in our plan. |

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| | Other more appropriate options:<br><br>Southern Water need to massively accelerate their plans to reduce leakage and repair of mains. As a Southern Water customer I am very upset that Southern Water customers are paying for large amounts of water to be treated which is then lost to leakage. If Southern Water sorted out leakage this would go a long way to providing the additional water needed, and would reduce the requirement for new schemes. They should get their existing infrastructure sorted out before they are allowed to implement any new infrastructure.<br><br>Capturing rainfall and storing it for use during drier periods would be a much better solution than effluent recycling. Effluent recycling is very energy intensive (and therefore bad for UK energy security) and bad for the environment. We need solutions that work with nature not solutions that use more energy and contaminate the environment. We need a more sustainable approach.<br><br>Moving abstraction points nearer to the sea to protect the chalk streams would be an option I would support. Diverting excess river water into reservoirs in the winter would also help to reduce flood risk from rivers. Options for storing rainwater (confined aquifers and reservoirs), reducing leaks and replacing mains should also be a significant part of future plans. These options would be cheaper as well as more environmentally friendly – both of which is good for customers.<br><br>Cheaper, more sustainable options should be seriously investigated by Southern Water and DEFRA.<br><br>I sincerely hope you will take on board my views (and the views of other respondees) and will force Southern Water to properly consider the alternative options. | • We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well<br><br>• Regarding storage options, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. |

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| | | A number of these plants can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>• We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding profit, Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding leakage, the leakage reduction target set by the Government is 50% by 2050. we are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period.<br><br>We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding alternative schemes, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume |

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| | | of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. |
| WRMP480 | I oppose Southern Water's plans to recycle waste water into drinking water as an ill conceived and unnecessary when there are far better and more cost effective ways to match future drinking water needs, including managing the complications of the more extremes of rainfall and drought brought about by climate change.<br><br>Instead of wasting capital funds on this scheme Southern Water should be investing in stopping leaks in their drinking water infrastructure and in improving their waste water and sewage infrastructure. They should also significantly upgrade the capacity of their sewage works which have shown to be inadequate for many years now, with the regular pollution of rivers and coastline which is still occurring, to the detriment of wildlife and those using our rivers, harbours and coastal waters. It is evident that by discharging untreated sewage, or part-treated sewage into the environment that Southern Water is saving money, as it is obvious that opening a sluice or valve to cause the discharge is far cheaper than storing and actually running the equipment to properly treat the sewage. This is a totally unsatisfactory situation which appears to be not addressed by the regulator or Southern Water. Southern Water would appear to have a vested interest in not stopping discharges into the environment, and thus not improving their sewage treatment works, but is instead proposing to use funds for a scheme that only benefits investors and no one else.<br><br>Finding the required investment funds, given the 'junk' status of existing loans, could come at high cost and therefore using any borrowed monies should be in worthwhile and sustainable schemes. The cost of this unnecessary, and overly expensive proposed scheme, will fall directly on Southern Water customer, with all the risks also on their shoulders.<br><br>The cost of both creating and running the proposed the recycling scheme (£1.2 billion) is way in excess of other proposals such as increasing water storage schemes, which would additionally address the future extremes to rainfall as climate change alters the weather patterns, and which will probably be required anyway as climate change effects become more pronounced. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: Our Drainage & Wastewater Management Plans (DWMPs)<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: Our Business Turnaround Plan \| Southern Water<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons.<br><br>Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can |

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| | Southern Water have a very poor record and have consistently put profit before performance letting down their customers over many years as permitted by weak to non-existent regulation. Recycling sewage water into drinking water carries risks to the consumer and when the profit motive, as driven by the Southern Water overseas owners, kicks in, then the health of many hundreds of thousands of customers could be put at risk. The proposed reverse osmosis equipment will require constant operation and maintenance and the pressure to cut corners and save money will be ever present.<br><br>Climate change is being driven by unsustainable consumption of resources and the Southern Water recycling scheme is both costly on this measure for both the installation of the large amount of required site construction and connecting pipe work and then running the recycling equipment. Thus Southern Water will be contributing to climate change at a time when they should be looking to reduce their carbon footprint.<br><br>The proposal to site the recycling scheme on a land fill site comes with additional risks, with the need to find solid foundations and possibly contaminate underground water supplies.<br><br>Many people are already sceptical about the source and content of their drinking water, and if this scheme is allowed, then there will be a big increase in the purchase of plastic water bottles, with the subsequent increase in plastic bottle waste, which is already a blight on the environment.<br><br>Defra should reject this scheme and also not permit any reapplication for recycling sewage water into drinking water. | provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Our estimated cost for Havant Thicket Reservoir is included in our Water Resources Planning tables.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders They have injected more than £1.6 billion of fresh equity into the Southern |

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| | | Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans and that when the Competition and Markets Authority (CMA) makes its PR24 determination it will provide sufficient funding for the investment in the 2025-2030 period.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Purified recycled wate is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We |

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| | | intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |
| WRMP481 | Dear Sirs. I am appalled by the thought that Southern Water may be permitted to recycle the effluent from my home, then sell it back to me as drinking water. It is bad enough that they tip sewage directly into the sea for all to swim in.....<br>What a waste of money to create a system that nobody wants and even fear for their safety. Do not proceed with this. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP482 | I am writing to formally object to the water plan proposed by Southern Water. I believe that the suggested plan is fundamentally flawed and not in the best interests of our community and environment. There are several compelling reasons why this plan should not proceed as currently proposed:<br>1. Large Upfront Cost: The initial financial outlay required for this project is significantly high. Such a substantial investment could be better allocated towards more sustainable and cost-effective water management solutions. This plan places an undue financial burden on the local community and taxpayers.<br>2. Large Ongoing Upkeep: The proposed plan entails considerable ongoing maintenance costs. These recurring expenses will strain resources, diverting funds from other essential services and infrastructure improvements. The continuous upkeep required raises concerns about the long-term financial viability of the project.<br>3. Large Ongoing Energy Requirements: Implementing this plan will result in substantial energy consumption. The ongoing energy requirements contribute to increased operational costs and heightened environmental impact due to higher energy usage. In a time when we should be prioritizing energy efficiency and renewable sources, this plan seems counterproductive.<br>4. Biodiversity and Environmental Damage: The chalk spring-fed reservoir, a critical natural resource, is under threat from this proposed development. The potential biodiversity loss and environmental degradation cannot be overlooked. The unique ecosystem supported by the chalk spring would be irreversibly damaged, leading to the loss of flora and fauna that are crucial to our local environment.<br>In light of these issues, I urge Southern Water to reconsider the current proposal and explore alternative solutions that prioritize financial prudence, energy efficiency, and environmental | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24).<br><br>The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie |

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| | preservation. It is imperative that any water management plan we undertake does not compromise the ecological integrity or economic stability of our community.<br>Thank you for considering my concerns. I look forward to hearing your response and hope for a more sustainable approach to our water management needs. | Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>2) We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>3) Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions.<br><br>Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>4) Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. |

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| | | Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. As a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP483 | Dear Defra<br><br>While I have made representations to other bodies, I feel that I must make a representation to yourselves as the wrong decision on Southern Water's plans could have a devastating impact on us.<br><br>Repairing leaks<br><br>If Southern Water put more effort into leak prevention, over 20% of the available water which is lost through leaks could be saved. I have examined Southern Water Services Limited statutory accounts and note that the company has remitted over £3 billion to group companies when at least a significant portion of these funds could have been used to seal the leaks. Southern Water have chosen price rises instead.<br><br>Sustainability<br><br>I have always believed that to minimise costs, our infrastructure companies must deliver sustainable solutions that are good for the environment. Having been to school and being | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>In response to the point about group companies, the highly regulated nature of the industry means we cannot secure the borrowings used to fairly fund investment against the operating company and thus we necessarily have financing arms which borrow money on Southern Water Services' behalf. Money raised from borrowers is paid to the operating company to finance activity and repayments are therefore made from bills paid by customers to the operating arm. If we did not borrow, then investments would have to be paid exactly as they were made—meaning that customers who moved away or are deceased would be funding |

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| | taught about the local aquifers, and their abundant supply of good pure spring water, I question why Southern Water are even considering building a treatment plant.<br><br>I am sure that you are aware of the regular flooding that occurs in the Southern Water area. We must investigate the aquifer solution to store and use this water, rather than treatment plants that will require regular capital spending.<br><br>Contamination at the proposed treatment plant site<br><br>I lived and have worked close to the landfill site, and I recall my employer at the time being given very clear instruction about ground water contamination on a proposed new manufacturing facility. I am therefore extremely concerned that the proposed recycling plant is going to be built on the landfill site, with deep piles and tunnels being constructed within the detritus and waste. I am very concerned that such a facility would leak contaminants into the soil and the aquifers below. We know from experience, that Southern Water cannot be trusted.<br><br>https://www.bbc.co.uk/news/articles/cn4zknwpk77o<br><br>https://www.theguardian.com/environment/video/2021/oct/26/drone-footage-shows-sewage-pumping-into-sea-in-hampshire-conservation-area-video<br><br>I do not believe Southern Water could construct a recycling plant in a safe manner, and in any case, I prefer the aquifer solution.<br><br>Water Storage<br><br>The Southern Water solution involves using huge electric pumps to transfer water over large distances. Surely a more sustainable and less costly solution if to have water storage facilities closer to where the water is used?<br><br>Financing and Water Bills<br><br>I mentioned in Repairing Leaks, that Southern Water were cash rich, but diverted £3 billion out of their operating company. I believe these funds should be returned to Southern Water Services Ltd to be used for capital investment and leak repairs. There is absolutely no need for the Government or Southern Water customers to fund the necessary infrastructure investment as Southern Water had those funds, and funding should come from a capital injection from shareholders as profit was taken out of Southern Water Services in the form of interest and dividends.<br><br>Summary | improvements they never benefited from. Our borrowing is regulated by Ofwat, which ensures a prudent approach is taken.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply–demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO), with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29, in addition to considering locations for new reservoirs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the company’s history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short, sharp improvement in performance across the board, and |

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| | So please, I ask that alternative solutions are investigated to the provision of water, and that DEFRA be mindful and not to bow to Southern Water's sole proposal which is in the best interests of their company, but not us residents and customers. | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP484 | I am writing to you to voice my concerns about the Havant Thicket Reservoir and Effluent Recycling plans.<br>Fundamentally this does not seem to be a project focusing on the supply of fresh water rather a project to build poorly thought out infrastructure with the main aim to bring profit to the shareholders.<br>As a country we need to be focusing on more sustainable ways to meet our everyday needs including the provision of fresh water. This aspect has been completely overlooked for this project and Southern Water's plan is taking us down the wrong path.<br>These are the main reasons why I object to the plan.<br>Expensive – why have cheaper less damaging options not been proposed such as rainwater capture into reservoirs and aquifers., moving current extraction points from rivers to just above the high tide limit thus reducing the impact on the ecology of our rivers as well as having the water extracted closer to where it is needed.<br>A risk to our environment - The carbon emitted will be considerable for both the construction of the plant and the pipeline as well as for the 60 years of planned operation. The emissions will mean that Southern Water will not be able to meet its carbon reduction commitments by 2030.<br>The huge impact on the environment and biodiversity resulting from the construction of the plant, the pipeline to and from Havant Thicket Reservoir, the 40 mile pipeline to [redacted] through countryside and requiring the destruction of hedgerows and the felling of trees. Not to mention the effect of pumping treated water into the unique biodiverse habitat being created at the Havant Thicket Reservoir using naturally occurring spring water changing the natural make of the water, introducing contaminants and changing the temperature.<br>Not the best option available – why have other better options not been fully explored or proposed including alternative sites for the effluent recycling plant (if it is needed at all). If despite all of the concerns about whether effluent recycling is needed, the significant environmental impacts, and the enormous costs to build & operate are to be ignored, Southern Water are to go ahead with their leaky plan, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br>It creates a bad precedent that will support other bad schemes - Water supply companies are permitted to profit from new infrastructure, so this scheme offers a chance to make significant profits. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plants can be built in a modular fashion—i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for customers and the environment in terms of meeting anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next five years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next five years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed a step-change in investment amounting to approximately £8 billion. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations, the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this necessitates investment in large-scale infrastructure schemes which, while benefiting long-term security of water supply and the protection of freshwater ecology and habitats, may have an increased carbon impact. |

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| | | As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options proposed in our WRMP24 strategy.<br><br>A Water Recycling Plant would typically be expected to last more than 60 years, with upgrades to electrical and mechanical components every 10–20 years.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocating the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in Havant Thicket reservoir and the Solent, as well as potential mitigations. |
| WRMP485 | To whom it may concern<br>I am writing in response to the consultation on the Hampshire effluent recycling scheme via Havant Thicket reservoir which Southern Water are proposing. I have many concerns which are | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding rainwater storage, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water |

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| | mainly environmental in nature but also as a Southern Water customer who is worried about rising bills and inappropriate use of monies.<br>We usually have plenty of rain in this country and the priority should be given to storing rainwater, not recycling waste water. These schemes are normally used in countries where water is scarce. I understand that use will be made of a landfill site for the effluent recycling plant, which will mean that toxic chemicals can leak into Langstone harbour and reject water discharged into the Solent. There are other more suitable sites.<br>It is also reported that there will be no independent monitoring of the water discharged into the reservoir, harming wildlife and customers if the stored water is used by Portsmouth Water in times of drought.<br>The scheme is also not sustainable as the extra pipe laying and transport costs will be huge, an estimated minimum £1.2 billion. Which is not a good use of customer's money. I am led to believe however that shareholders would benefit! Also the public will be wary of using tap water and many will resort to using bottled water which has a high environmental cost in terms of plastic usage.<br>As a Southern Water customer I have long been concerned about sewage discharges and previous lack of investment in sewage treatment and water leakage. I would urge Southern Water to listen to their bill payers and do the right thing by stopping this scheme and exploring more cost effective and sustainable solutions. | butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We |

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| | | have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>With regards to the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: Our Drainage & Wastewater Management Plans (DWMPs). |
| WRMP486 | I am writing to lodge my opposition, as a local Emsworth resident to the plans for wastewater recycling linked to the reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or |

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| | I believe the nature of the plans were surreptitious, and covert. Agreeing planning with HBC for a "recreational lake" only to subversively change the nature of plans to something more sinister without an overtime consultation.<br><br>I believe most residents are not fully aware of the proposed changes, that the consultation has not been adequately publicised or explained, and that the change of use of the reservoir is attempting to be backdoored before local people understand the impact and implications.<br><br>My major reservations around the plan include:<br><br>-No clarification or justification on why rainwater recycling is not being considered in one of the countries with lowest capture and highest rainfall!<br><br>-how we can trust southern water, imposed with multiple sanctions for environmental breaches as custodians of our future drinking water<br><br>-after the loss of what should have been a community environmental space (the avenue), we are not only losing this, but contributing to increasing environmental degradation with a plan that requires fossil fuels and construction at further impact to the local environment.<br><br>- the failure to address the leaks in the existing network, which (albeit at huge cost), seems to in no way impede dividends for shareholders per annum. Fixing leaks would give us all the water we need given they currently lose a fifth or more through poor maintenance of their network.<br><br>-the level of pollution at [redacted] is already at a completely unacceptable level. As someone who has been resident in the area for 42 years, I can visibly see the denigration of water quality, this has been evidenced by the samples taken by the final straw charity which made national news.<br><br>We stand on the edge of a precipice. Much of what makes the area special and alluring hangs precariously in the balance. To hand the keys to that tipping point to an organisation that has routinely demonstrated that it is not fit to be trusted with it's existing mandate is nothing should of madness.<br><br>I implore you to please oppose the plans to use recycled sewage to provide water, and uphold a mandate on a recreational lake for the local area and environment to utilise, forcing Southern to explore more considered and environmentally friendly solutions to their plans. | 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation.<br><br>All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information<br><br>We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>- Regarding rainwater recycling: reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>- We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme |

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| | | ever for the years ahead after listening to our customers: Our Business Turnaround Plan \| Southern Water<br><br>- The water recycling proposals are not expected to impact the proposed recreational use of the reservoir. Portsmouth Harbour WTW is already in existence. The water recycling plant will be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>- On leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. Our PR24 Price Review is being redetermined by the CMA.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |

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| | | Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans. |
| WRMP487 | Dear Defra,<br>I have read many pages about the proposals from Southern Water to increase the water supply. While I do not disagree in principle to recycling effluent, it is a very expensive option. Much more emphasis should be given to increasing water storage from winter rain, replacing old water mains to decrease leakage and reducing the use of potable water for applications for which it is not necessary. I appreciate that water is a precious resource and we should all try and reduce our consumption of it. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Regarding cost, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We |

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| | | will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. |
| WRMP488 | It is strange how often the subject of water comes up in conversations in the UK, far more than any other country I know. We live in an environment famous for its precipitation. Any foreigner who thinks of England thinks of men with unbrellas. Yet despite all our rain fall we appear to be unable to manage our water supply to houses, the natural environment and industry. Also despite the fact that we live in a beautiful island we have little concern over discharging untreated sewage into areas of nature conservation without any repercussion for those responsible.<br><br>I regularly swim in the sea in Chichester harbour and have to keep an eye on the discharge that has occurred to know if I am relatively safe to swim here. Apparently you replied to my husband saying the discharge is okay because it is dilute????? Do you swim in it? Would you put your face in it? Would you like your dilute discharge dumped on your doorstep?<br><br>I now hear that you are considering plans to get more safe water to our homes. I think this idea is commendable. Now lets think about how you are going to do it.<br>With an average of 732mm of water per square meter each year, I am sure you can work out how to collect and store some of this. The Romans used Cisterns to collect the water - simply a hole/basin dug into the ground. The Inca used reservoirs, Cisterns and Qochas to collect the water. The use of wells is well known (pum unintended). The ancients even reused their dirty water to irrigate the land which serves several puposes including drenching the soil. fertilizing it and helping to clean it up before it got into streams and rivers. Soft soil is better at absorbing the rain so that it helps avoid flooding.<br><br>I'm pretty sure with our tchnology we can work out how to build more reservoirs, and underground storage sites.<br>We could reintroduce more boggs and wetlands to reduce the flow of water causing flooding.<br>Plant more trees to help slow the water flow in floods.<br>We should be making all our houses have two water systems, one for grey water for flushing toilets and one for clean drinking water.<br><br>The romans and many other ancient civilisations used a variety of plumbing techniques to transport water, understanding the value of this rare and precious resource. Surely we can distribute it to customers without losing nearly 20% of it. Try fixing the pipes we have. Less water lost means more water available, simple logic. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations).<br><br>The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions.<br><br>In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans. |

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| | Build more water treatment sites. We all know you are not responsible for the excessive rate we are building houses in areas that can barely manage the current supply of dirty water. You are however responsible for getting more treatment sites built. Lobby the government to get this a priority before they press ahead with another 10,000 houses in Emsworth.<br><br>Since rising global temperatures are the main reason for the excessive rainfall we appear to be getting, I find it surprising that you would choose an option that increases the production of carbon dioxide. Surely you are just adding to the problem.<br><br>In summary<br>1. build more treatment centres.<br>2. fix the leakages<br>3. build more reservoirs or underground storage sites.<br>4. stop discharging sewage into the environment.<br>5. Choose carbon neutral methods. | 1. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases.<br><br>The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so.<br><br>Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback.<br><br>In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing. |

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| | | 2. Regarding leakage reduction, The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period.<br><br>We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>3. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>4. Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>5. Our capital programmes are delivered in line with our regulatory commitments and operational needs. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the |

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| | | Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |
| WRMP489 | This plan by Southern Water to add treated affluent to our drinking water is going to cost millions of pounds to install and maintain, and in a relatively short time need replacing and we, the customers , will pay for it.<br>There are other ways of providing the water need that are cheaper and more environmentally friendly, need less maintenance and will still be in place in the future….ie reservoirs.<br>Currently we collect only 1% of the generous amount of rain that falls. That is so wasteful!<br>Can we trust SW to run and maintain this scheme they are suggesting? Their record of dealing with our waste is abysmal.<br>I suggest we do not want this plan and ask you to reject it. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding cost, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time.<br><br>Regarding alternative options, We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We |

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| | | will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP490 | Dear Sir , Madam,<br>I am alarmed to discover that S. Water are proposing to introduce “final treated effluent “ at the Havant Thicket Reservoir and strongly disapprove of this scheme.<br>This is a complex & costly technology with a high risk of damage to the environment by potentially polluting the reservoir, Langstone Harbour & the Solent.<br><br>Given S Waters reputation for inadequate investment in the physical infrastructure , numerous prosecutions for ongoing pollution along our coastline, poor maintenance of treatment plants and failing pumping stations, I dont feel that they be trusted with this untested scheme in the UK, which has a carbon & energy cost of £3 million per year?<br><br>I am very concerned about the quality & safety of the water processed in this manner which will be used not only in Hampshire but also transferred to West Sussex. It would be a retrograde step should people consider the need to use bottle water.<br><br>I feel it would be better to apply more sustainable & less damaging solutions to improving the ailing system by building new reservoirs & using confined aquifers to collect & store more “ free” rainfall , which would also reduce flooding.<br>These storage facilities should be built closer to where the water is needed so that long pipelines that damage our countryside & wildlife are not required.<br><br>Concentrating on reducing the daily leakage of 100 millions litres of water by replacing the old pipe network with new water mains for which they have already received considerable amounts of government funding , would also be of greater value to the environment & S. Water customers.<br><br>I was unaware of this “refreshed proposal “until advised by a friend this week. ( Nov 20th 2024)<br>Were S. Water obliged to inform its customers of these plans?<br>If so ,how & where?<br>With a deadline of December 4 th 2024 to respond I am fearful that many residents do not know about & have not seen plans nor maps of the proposals regarding effluent recycling. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. |

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| | I strongly encourage you to reject this proposal & put greater pressure on S.Water to develop sustainable solutions that put the environment & customer preference before profit. | As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

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| | | A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We also released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>We have received 1176 responses as part of rdWRMP24 consultation.<br><br>The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and |

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| | | guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>Regarding our schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP491 | I request that you reject Southern Water's ridiculous, expensive, not sustainable and damaging plans in Hampshire.<br><br>I do not support Southern Water's here in Hampshire at the Havant Thicket Reservoir.<br>Their plan does not develop sustainable solutions and certainly does not work with climate change to collect the forecast increase in rainfall and store it in new reservoirs.<br>This could reduce flooding too.<br>Southern Water should already be reducing their ridiculous amount of leakage.<br><br>Southern Water already have a dreadful record for allowing the pumping of effluent into Langston Harbour, what guarantees would we, the customers, have that Southern Water would safely operate such a complex plan. We have no faith that would happen. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Regarding sustainability and climate change, we conduct an options appraisal process, wherein all options are considered regardless of size. The options presented in the plan represent, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. The Water Resource Planning Guideline requires WRMP24 to be a Best Value Plan i.e. a plan that aims to deliver wider benefits to society and the |

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| | The long pipelines suggested in this plan would only succeed in damaging the countryside and harm our precious wildlife. This is not acceptable! Neither is the cost involved.<br><br>Finally effluent recycling is NOT what we and I suspect most people would drink.<br>That would only increase the use of single use plastic in the shape of bottles.<br>That is what has happened in two other countries. | environment, by taking account of a wide range of factors, alongside economic cost, in identifying the preferred water resource programme.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding leakage, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding pipelines, our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is |

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| | | added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP492 | I wish to object to the current plan by Southern Water regarding the use of of recycled sewage effluent from [redacted] .<br><br>I am one of very many people extremely worried about the environmental aspect of this scheme. There seems to have been very inadequate consumer and public consultation about the long-term wisdom and also the huge costs involved concerning these plans, and we are aware that that there are cheaper alternatives which might provide a better deal but which have not been properly considered.<br><br>Concerns have already been expressed about this plan increasing the intensive energy security around the planet.<br><br>There is also a real risk that the work needed at Langstone Harbour and at Broadmarsh will result in a totally unavoidable and unacceptable environmental risk to the area around the harbour.<br><br>Why has Southern Water not developed more and better solutions to store free natural water and why especially have they not improved their system of improving leakage reduction.<br><br>Because there is no independent monitoring of pollution planned, there is a risk of pollution from the recycling plant if it is not properly maintained by Southern Water. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Regarding consumer and public consultation, in addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>We have received 1176 responses as part of rdWRMP24 consultation.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the |

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| | | sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>On developing reservoir storage, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, it is worth noting that reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option<br><br>On leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. |
| WRMP493 | Dear Sirs,<br><br>I write in response to your revised water resources management plan proposed by Southern Water, I strongly suggest that Southern Water take a more realistic view of the water resources position and produce a more sustainable water management plan.<br><br>I would urge them:<br><br>1. to abandon, altogether, the effluent recycling scheme, an abhorrent, environmentally damaging and extremely costly plan.<br><br>2. to abandon, also, such stop-gap, expensive and environmentally damaging measures such as the ridiculous idea of bringing tanker loads of water from Norway.<br><br>Instead, I would suggest that:<br><br>A. An intense programme of repairing and stopping leaks should be prioritised. It seems a very poor plan to merely reduce leakage by 53% by 2050.<br><br>B. Our precious chalk streams and rivers should be guarded and protected, instead of them being robbed and polluted.<br><br>C. The capture and storage of our prodigious winter rainfall should take precedence, which in turn would thereby reduce disastrous flooding.<br><br>D. Schemes to increase water storage capacity at existing works should be prioritised.<br><br>E. The idea of a free water butt scheme for customers, as trialled in the Isle of Wight, is admirable. Everyone could do a little more to conserve the water supply.<br><br>Finally, the effluent recycling scheme cannot represent the best value for customers. It would be exceedingly expensive. There are many ways, some of which are mentioned above, of using those costs in a far better, more environmentally satisfactory way, instead of in one which is wholly repugnant. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. With regards to the environment, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>With regards to cost, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>2. Regarding the viability of sea tankering, it is no longer included in our plan.<br>.<br>A. Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>B. We note the objection to the use of recycled water in Havant Thicket. We acknowledge your desire to protect the Chalk streams. A further consultation on water quality was held in Spring 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |

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| | | As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the Environmental Assessments for the WRMP. Work is being undertaken by our environmental consultants to these comments and make any necessary changes to ensure that the assessments align with regulatory requirements.<br><br>C. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>D. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>E. Based on typical rainfall in the UK, by fitting a water butt to your gutter and downpipe, you could save up to 24,000 litres of water a year – which is one reason that our business customers are able to claim a free water butt from us: https://www.southernwater.co.uk/save-a-little-water/saving-water-in-your-business/water-butts-scheme/<br><br>Slow-drain water butts are also effective in reducing water run-off and decreasing the pressure on storm sewers, as our pilot scheme on the Isle of Wight has shown, and where we have now installed over 4600 water butts: https://www.southernwater.co.uk/latest-news/free-water-butt-initiative-expands-to-gurnard-on-the-isle-of-wight/ . These water butts have a drain installed halfway up, allowing the top half to slowly drain into the network over several hours. This way around 100 litres is left empty for the next time it rains. Following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>Regarding value, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

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| | | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP495 | I refer to Southern Water's plans to re-cycle sewage effluent into supplies of drinking water.<br><br>It is my understanding that Southern Water's plans have not previously been put into effect in any other area in the UK. From this I would conclude that Southern Water have not realistically considered the many alternative options that could be used to ensure adequate supplies, all of which would be environmentally friendly.<br><br>In particular I consider that Southern Water should be compelled to improve:<br><br>~ reduction of leakages (say halving the current level of leakages by 2035 instead of 2050)<br>~ introduce plans to increase the level of rainfall collection. I do not know what might be a reasonable level, but certainly should be far in excess of the present 1%.<br>~ reduce the level of effluent / sewage released into the sea by increasing storage areas for use in times of high rainfall.<br><br>It seems that whilst private individuals are encouraged and in many respects required to act in an environmentally responsible manner, the same restrictions do not apply to Southern Water.<br><br>Whatever of the various options available to Southern Water are decided upon, their performance should be monitored and failure should result in withheld dividends / loss of director bonuses. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>On considering alternative options, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br><br>On leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>- We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | | On increasing reservoir storage, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>Regarding monitoring, the Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Regarding profit, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP496 | What a pity Southern Water continue to get solving these such important issues in a manner that clearly ignores other professional bodies who have given their advice! | Thank you for reviewing our rdWRMP24 and providing feedback. |

| Reference | Feedback | Southern Water Response |
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| | | We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP507 | Good day,<br><br>We wish to raise our concerns over Southern Water's proposal to use recycled sewage effluent to top up our water supply. From previous records, Southern Water are often responsible for sewage leaks so how can we trust that any treated water would be suitable for drinking? If they spent the funds required for the treatment plant on leak repairs and rain water collection, there would be far less need to top up the water supply from the sewer.<br><br>Southern Water should put the wellbeing of the customers before profit and the impact on the environment should be top of their list.<br>We would not have confidence that Southern Water would provide clean drinking water from 'treated' sewage and feel that we have sufficient rain fall, which if collected in the large new reservoir at Havant Thicket (paid for by local water rate payers) should be enough to supply the local area.<br><br>Please consider our concerns when making the final decisions regarding Southern Water's latest plan.<br>Thank you and kind regards, | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>On leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding profit, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum |

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| | | profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives<br><br>For information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP508 | I wish to strenuously object to the effluent recycling scheme proposed by Southern Water, i.e. the plan to build a new wastewater recycling plant close to the [redacted] site and pump 'treated' recycled water up to the Havant Thicket Reservoir.<br><br>When the plans for Havant Thicket Reservoir were proposed under Portsmouth Water's oversight I was concerned about the effect on wildlife and nature, but never imagined that Southern Water (who were fined for deliberately discharging raw sewage)1 would become involved. The idea that recycled sewage effluent would be added to water stored at the Reservoir fills me with horror.<br><br>Southern Water have already demonstrated that they are an unserious and untrustworthy company which has been systematically polluting (amongst many other places) Langstone | Thank you for reviewing our rdWRMP24 and providing feedback, and we note your objection to the Hampshire Water Transfer and Water Recycling Project (HWTWRP).<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically- |

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| | Harbour. Their lackadaisical and arrogant behaviour over those issues does not bode well for their involvement in the first such scheme to be tried in the UK. I have absolutely no trust in this company - their lack of transparency and the fact that they are owned by venture capital companies demonstrates that they are only in this business to make money and not to provide an essential public service. Indeed, Mr Justice Johnson said in his ruling against Southern Water that their previous offences had been motivated by a desire to "focus the company's attention on those metrics that increase its income, disregarding its wider compliance obligations"1.<br><br>Even if it were not Southern Water proposing this scheme I would still be against it, as it is overly complicated, unrealistic and expensive, whilst not addressing many of the issues that the water companies have ignored over the years, e.g. maintenance and replacement of the current water distribution system. There are other, more environmentally-friendly ways of improving our water supply, starting with the harvesting of rainwater and urgently addressing leakage in the mains supplies, something that has been neglected across the board since privatisation.<br><br>If this scheme is given the green light, it is imperative that the safeguards Southern Water and Portsmouth Water suggest will be in place need to be guaranteed, 100% of the time. Given (especially) Southern Water's track record, this is not something I feel can be achieved. As well as getting ill from exposure to polluted water in the harbour, local people may now be exposed to similar risks when drinking water from their taps. Mr Justice Johnson again – "[Southern Water] showed a shocking and wholesale disregard for the environment" 1 and even Southern Water themselves agreed that their acts had been "negligent" 1.<br><br>I urge you not to allow this scheme to go ahead. Safe drinking water should be a right and not a game of Russian roulette. We need safe and sustainable water for all consumers. | sensitive chalk streams support a wide variety of species, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available.<br><br>We are undertaking a range of environmental assessments, as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk/index.html. The report details the preliminary findings of our environmental assessments based on the information available to date. The environmental assessments will continue to be updated and will be documented in an Environmental Statement that will be submitted as part of the Development Consent Order application.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.is<br><br>Our plan already includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Regarding water quality standards and drinking water safety, the HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England |

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| | | and Wales. Further information on water recycling safety and standards is available on the DWI website https://www.dwi.gov.uk/water-recycling/<br><br>Regarding leakage, the reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP509 | I would like to object to the Southern Water plan and ask that Defra please reject it and get them to rework it given the number of objections and concerns I am sure you are receiving.<br><br>My specific points are that I really do not agree with the plan to pump treated water into the new Havant Thicket reservoir. That was not in the original plans that were agreed for the project to go ahead and fills me with horror. We have more than enough chalk aquifer options to fill it with pure water in the winter months.<br><br>I am not happy with the expansion plans for [redacted], especially the part where it will be on top of what was a significant landfill site. You only need to see the road to see how unstable the whole area still is around Broadmarsh.<br><br>I have lived in the Langstone and Emsworth area for over 50 years and have had to put up with the smell from [redacted] that hangs over the western part of Havant and Langstone particularly. Surely with modern engineering and technology this can be addressed. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>We note your comments regarding odour in the area near Portsmouth Harbour WTW. As this consultation is for our Water Resources Management Plan which covers our plan for provision of drinking water we are unable to comment. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP510 | This is utterly unacceptable. You cannot now keep our drinking water safe, it is cloudy, it smells, it has weird tastes on odd days. I boil all my water before using and only drink bottled water.. but the bigger tell tale is that my dogs will not drink the water that comes directly out of the | Thank you for reviewing our rdWRMP24 and providing feedback |

| Reference | Feedback | Southern Water Response |
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| | kitchen tap. They avoid it and go outside and drink the pond water or any other container with rain water in it..<br>Dogs know what's not safe so tell me please why they won't drink tap water if it is so called safe to drink.. | Water across the country has its own distinct taste influenced by the geology of the local area. The water quality compliance, as currently set out in our 2023-24 annual report, at our reservoirs is at 99.9%. We are always striving to improve this and our water supply is closely regulated by the Drinking Water Inspectorate (www.dwi.gov.uk).<br><br>If you have particular concerns regarding the quality of your tap water, please visit https://www.southernwater.co.uk/help-and-support/my-water-looks-smells-or-tastes-unusual/ where the causes of various issues are explained, and you can report a problem if necessary. |
| WRMP511 | To Whom It May Concern<br>Subject: Concerns Regarding Proposed Effluent Recycling Plant and Water Management Plans<br>I am writing to express my significant concerns regarding Southern Water's plans for the effluent recycling plant and related water management strategies. While I appreciate the challenges of ensuring a sustainable water supply, the current proposals raise several serious environmental, economic, and community concerns.<br>Key Concerns<br>1. Lack of Sustainable Rainwater Utilization<br>The UK collects only 1% of its rainfall. It is imperative that Southern Water develops solutions to store the abundant winter rainfall for use during dry summers. This free and natural resource is underutilised.<br><br>2. Environmental Risks at Broadmarsh (Site 72)<br>Developing the effluent recycling plant and deep tunnel shafts on a contaminated landfill site poses unacceptable environmental risks to Langstone Harbour. There are safer, more suitable locations that avoid jeopardising this sensitive environment with increased illnesses across water users both human and animal being reported due to the atrocious quality of the local water ways. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We acknowledge concerns raised about the need for the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution and set out our response below.<br><br>1. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>2. Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development. Southern Water has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response. |

| Reference | Feedback | Southern Water Response |
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| | | 3. The water recycling plant will be designed to be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements. As above, any impacts on landscape from the proposals will be addressed through the ongoing Environmental Impact Assessment. To keep up to date with the plans you can visit https://www.hampshirewtwrp.co.uk.<br><br>4. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available. The location of the WRP (water recycling plant) is because it needs to be close to where there are sufficient levels of treated effluent.<br><br>5. We are teaming up with neighbouring water companies to build two reservoirs that will supply our customers with water – one at Havant Thicket and one in Oxfordshire. Our plan also includes provision for building another in Sussex. We have looked at building more reservoirs locally, however finding suitable sites close to a reliable source and where the water is needed, with the right ground conditions, is challenging. We have also investigated aquifer storage and recovery options in Hampshire which can be used for storing water underground in porous rock so it can be available when needed. We are investigating one such scheme in the Lower River Test for delivery from 2040 that could provide about 5.5 million litres a day. However, this would only address a very small amount of the shortfall that we face. The issue elsewhere in Hampshire is that the aquifers are not confined – i.e. the water would simply flow away.<br><br>6. Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information. We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>7. We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/. Regarding water quality standards, the HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when |

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| | 3. Visual and Environmental Impact<br>The proposed plant at Broadmarsh will have a significant visual impact on the Langstone Harbour area. Additionally, the discharge of reject water into the Solent will be highly concentrated—four times more than current sewage effluent—causing potentially significant environmental harm.<br><br>4. Inefficient Location and Cost Concerns<br>Building the plant over 40km away from where the recycled water is needed is not sustainable. The annual operational costs of transporting water are projected to exceed £3 million, which will burden customers while also exacerbating energy consumption and emissions with a huge impact from relocation and loss of earnings on those poor people and businesses who will be in the line of sight of the massive ground works necessary to fit and maintain pipes and channels to transport the water and sewage.<br>5. Missed Opportunities for Greener, Cost-Effective Solutions<br>Greener alternatives, such as winter storage reservoirs, have not been adequately explored. These options could provide long-term benefits, including biodiversity and recreation, while being more cost-effective.<br><br>6. Insufficient Public Consultation<br>The public consultation process was inadequate. Southern Water should have conducted a full statutory consultation, ensuring widespread awareness through clear communication, including posters in impacted areas. All affected customers should have been consulted.<br><br>7. Trust and Operational Concerns<br>Southern Water's track record of treatment plant and pumping station failures undermines trust. The absence of independent monitoring of the discharge into the reservoir is also deeply concerning. | transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. Further information on water recycling safety and standards is available on the DWI website https://www.dwi.gov.uk/water-recycling/<br><br>8. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations).<br><br>9. All HWTWRP documentation is available on the dedicated website; https://www.hampshirewtwrp.co.uk where you will find contact details should you wish to get in touch with the project team regarding any clarifications needed on the information available.<br><br>10. Once HWTWRP is operational, water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. We don't expect customers to buy bottled water when the water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>11. Regarding the addition of recycled water to Havant Thicket reservoir, a further consultation on water quality for HWTWRP was held in March 2025. This includes details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The Environmental Water Quality Report, in summary, shows that changes in water quality in Langstone Harbour would be small and are not expected to have any impact on biodiversity. The report also confirms that reject water from the water recycling process, which will be released into the Solent, is unlikely to affect water quality or the biodiversity of the Solent. The full report is available to download here https://www.hampshirewtwrp.co.uk/EnvironmentalWaterQualityReport.pdf |

| Reference | Feedback | Southern Water Response |
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| | 8. Leakage and Waste<br>Southern Water loses 19% of its treated water daily due to leaks—equivalent to 100 million liters. The current leakage reduction targets are insufficient. A more ambitious program to replace mains and improve distribution could achieve a 50% reduction by 2040 and 70% by 2050.<br><br>9. Misleading Communication<br>The illustrations in Southern Water's Consultation Brochure fail to clarify that recycled water will be supplied to Portsmouth Water customers during droughts and emergencies, with more routine supply expected after 2040. This lack of transparency is troubling.<br><br>10. Risk of Public Backlash<br>The proposal risks eroding public trust in tap water, potentially driving increased consumption of bottled water and worsening plastic waste issues.<br><br>11. Biodiversity Loss and Long-Term Sustainability<br>Creating a chalk spring-fed reservoir would provide a unique opportunity for biodiversity. Recycled effluent input, however, risks altering water quality, temperature, and geochemistry, with unknown consequences for biodiversity.<br>Conclusion<br>The current proposal for the effluent recycling plant raises significant environmental, economic, and public trust issues. Southern Water must prioritise greener, more sustainable, and community-supported alternatives.<br>I urge Southern Water to reconsider these plans and engage in meaningful consultation with all stakeholders to ensure the best long-term outcomes for both people and the environment.<br>Thank you for your attention to these concerns. I look forward to your response. | |
| WRMP512 | I wish to register my objection to Southern Waters current plans to create more environmental problems and public health issues through increased use of recycled sewage. Specifically, there must be a move towards more use of pure water rather than recycled water. Also, a commitment to reduce wastage of water, whether pure or recycled. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is |

| Reference | Feedback | Southern Water Response |
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| | | added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The HWTWRP scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>On leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP513 | To Whom it May Concern,<br><br>I want to voice my opinion about the SW DEFRA Management Plan. There are far too many reasons for my objections to be all listed in this email. But, let it go on record that I am unhappy with the proposals. It sounds unreasonable to spend money to transport water from Norway than to figure out how to make use of all the rainwater in the UK It is also extremely disappointing that the original proposal for the Havant reservoir was tempting the community to agree by offering it for the use of water sports, etc. Once that was agreed it was then dismissed and now it is becoming something else entirely. It's been disruptive to the community and will cost us money. | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection has been noted.<br><br>Our website will contain the development of our WRMP24 and, going forward, our WRMP29.<br><br>Sea tankering is no longer included in our plan.<br><br>In order to capture more rainfall, we are planning to build two reservoirs. The Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We |

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| | | will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The water recycling proposals at Havant Thicket are not expected to impact the proposed recreational use of the reservoir.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |
| WRMP514 | Hi<br><br>I live in Portsmouth and I just heard about the plans to mix 'recycled' water from [redacted] sewage works with the fresh spring water currently sourced at Havant, and serve it up as tap water. So they can ship extra water to Winchester.<br>Basically you are trying to get away with charging us to drink our own piss?<br>I am categorically against this. It's a disgusting idea. Sooner or later someone is going to get typhoid or cholera if you guys keep mismanaging our water supplies like this.<br>Even if it was technically feasible to do this and get this right, how can we trust the people that gave us this situation …<br>https://www.bbc.co.uk/news/av/uk-59050129<br>… to build it and run it correctly.<br>Would anybody profiting from this actually come down here and drink this water?<br><br>This untried technology may be necessary in oil-rich, water-poor desert environments, but it is wasteful in terms of energy use and has no place here. And the site you propose to build it on is an unstable old landfill site with all the environmental hazards that that entails. I really had to check the date to make sure this was not an April Fools Day wind-up<br><br>You leave my water supply alone! Winchester can find it's own water<br><br>- A resident of Portsmouth<br><br>There will be a HUGE campaign against this. You will not get away with it.<br><br>Sort [redacted] out so it no longer pollutes the harbour I sail in, and stop letting greedy foreign fat cats loot and pollute our precious country for their greedy profit | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

| Reference | Feedback | Southern Water Response |
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| | | Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>Regarding effects of recycled water on local ecology, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID) gated process. |

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| | | Regarding the quantification of cost was considered when we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP515 | As a resident of Rowlands Castle - Please see below objections:<br><br>Further to Southern Water's (SW) last draft Water Resources Management Plan in 2023, which included [redacted] effluent recycling via Havant Thicket Reservoir, being rejected, it would appear that they have now just recycled the same old leaky Plan, with more effluent recycling, but this time they are also proposing to tanker water all the way from Norway to Southampton in a drought to plug the gap in their plan to 2035! Even SW previously rejected tankering from Norway as a stupid idea (very expensive and environmentally unsound, with the risk of importing non-native species), but rather than look at more sustainable options that might undermine their case for recycling effluent they have effectively recycled their old Plan giving lots of reasons why the better options cannot be developed quickly enough and the effluent recycling scheme still remains their best option.<br><br>FACTS:<br><br>* In the UK we only collect 1% of rainfall. We need a better plan that works with climate change to collect more water in the predicted wetter winters and to store it for use in drier summers, using underground confined aquifers and by building new reservoirs. Instead, SW proposes energy and chemical hungry effluent recycling from which it and its owners will be able to profit very considerably over many years from both construction and operation. The | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resources Management Plan (WRMP) looks at our future water needs from 2025 to 2075. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. Sea tankering from Norway is no longer included in our plan.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million |

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| | recycling plant will be located on an old landfill site on the coast at Broadmarsh (Havant), with piling and tunnelling putting Langstone Harbour at risk from leachate and the recycled water will be pumped up to Havant Thicket Reservoir and then 40kms to [redacted]. The current building costs are £1.2billion and spiralling. We need a radical rethink on where and how the company takes water from the environment, for example moving its abstraction points closer to the sea to leave freshwater in our precious chalk streams for longer.<br>* It is shocking that SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet SW's slow programme for improvements means even by 2050 SW will still be leaking about 10% of all the water it treats, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious leakage and mains replacement programme SW will never get leakage under control.<br>* An industry leakage expert tells us if SW put the funding and priority in, SW should be striving to achieve a 70 % reduction in leakage by 2050 (not the 53% target in its plan).<br>* In West Sussex, SW has not taken action to connect up its network and as a result SW is dismissing options because it can't get the water to where it is needed. Why is SW not connecting up the network? It is because they want to get the recycling schemes underway first. If the Plan goes through, the use of very expensive effluent recycling schemes will effectively have been approved and SW will be able to carry on and build these schemes at great cost to its customers and the environment.<br><br>All unacceptable. | litres of water per day to residents in Hampshire. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable as a result of the reduction in abstraction licences on the whole river and groundwater system and potential impact on migratory fish.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | With reference to a connected network in West Sussex, network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29. |
| WRMP529 | Dear Sir,<br><br>It is understood that Southern Water proposes to pump sewage effluent into the new reservoir at Havant Thicket, which was originally approved by Havant District Council to store pure spring water for distribution to the residents living in the South East area served by the Portsmouth Water Company.<br><br>I am OPPOSED to the latest proposal to pump sewage effluent to mix with the pure spring water at the HT Reservoir<br><br>This process is energy intensive and unsustainable. Due to climate change, we have the opportunity to set an example and also adhere to our sustainable commitments through the use of an energy efficient and sustainable solution for the effluence.<br><br>There is no public trust in Southern Water which has chosen profit over people for too long. They have dumped sewage in our rivers and sea and has lost public trust. There has been a public outcry and all you have to do is note the first upset in the local election for MPs—which had mostly to do with the sewage issues and Southern Water.This trust will no doubt carry on to lack of trust in drinking recycled sewage water and could lead to countless households purchasing bottled water.<br><br>We must:<br>• We request that you demand that Southern Water do more to repair leaks and replace mains. If they put the funding & priority in they should be striving to achieve a 70 % reduction in leakage by 2050.<br>• Educate the people from child to elder about the importance of conserving water.<br>• Provide incentive to harvest rain water for gardens<br>• Create more reservoirs<br>• An in depth independent review of the ability for SW's recycling engineering to satisfactorily cleanse the recycled effluent removing all known chemical pollutants and pharmaceutical contaminants by independent specialists in this field.<br><br>Furthermore, we request that the authorities conduct:<br>• An in depth independent review of the entire proposed infrastructure by independent qualified professionals in this field be published.<br>• An in depth independent review of the costings of all the proposed infrastructure, pipes, pumping stations, etc. by independent financial advisers.<br>• Total cost analysis of the on going maintenance required for a project that will be required to run daily all year round and not just in drought conditions and to forecast the life time of such a project. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) will facilitate the use of purified recycled water to augment the Havant Thicket reservoir. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and offer greater resilience in the event of a prolonged drought. The selection of HWTWRP followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available.<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/. For information on how we are addressing storm overflows, see; https://www.southernwater.co.uk/about-us/our-plans/clean-rivers-and-seas-plan/<br><br>Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding water user education, we have a home visits programme and a schools programme which are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water. |

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| | • An independent review of the state of the infill-site at Broadmarsh which will be cut open to enable all the 45kms of piping required to transfer the water to the [redacted] pumping station and beyond.<br>• Forecasting of the chemical and health impacts the opening of this infill site will have on the harbour and communities.<br>• Full review of the life cycle emissions<br><br>Please note, I am 100% in favour of the original plans for the Reservoir primarily because we need to store water in the rainy months so that we can have water during drought or times with less rain. Our catchment is particularly vulnerable due to the karst in the chalk and the water flows quickly through small fissures in the chalk to the source. It makes sense to conserve it in a reservoir/s.<br><br>The site is designated by the Environment Agency as a "Principal Aquifer", one of only 11 such sites in the UK. It is also within an Aquifer "Source Protection Zone" classified as "Outer Zone 2". Our water supplies are extracted by Portsmouth Water (PW) through the Havant and Bedhampton Springs, 6 km to the SW of the site.<br><br>Clean groundwater is precious, finite and essential for health, the environment and our infrastructure. Our groundwater catchment is vulnerable and it is our duty to support, conserve and protect this fragile groundwater ecosystem and to promote catchment management approaches that will ensure its purity and longevity.<br><br>Many thanks for your consideration of these points. | On incentives, we already have incentives in place for collecting rainfall in gardens: We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Based on typical rainfall in the UK, by fitting a water butt to your gutter and downpipe, you could save up to 24,000 litres of water a year – which is one reason that our business customers are able to claim a free water butt from us: https://www.southernwater.co.uk/save-a-little-water/saving-water-in-your-business/water-butts-scheme/.<br><br>With regard to rainfall storage, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). However, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>With regard to an independent review, our regulators the Environment Agency, Natural England and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the plan, including the options and risks. Our Statement of Response shows the feedback we received from these regulators and how we have responded to it. The options and risks associated with major schemes such as HWTWRP are assessed independently by RAPID through the Gated Process, and the WRMP as a whole requires Defra approval before this plan can be finalised. |
| WRMP535 | Dear sir / madam<br><br>Our community is appalled that Southern Water are considering the proposed plan at Budd's Farm.<br><br>Firstly, medications, drugs, all sorts of chemicals pass through human bodies into urine - to propose we then drink water that is contaminated with these chemicals is not only harmful but criminal.<br><br>Other concerns are listed below:<br><br>A – We get plenty of rain in winter, Southern Water should be developing solutions which store that free natural water for use in dry summers. Only 1% of rainfall is collected in the UK. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is needed to provide the additional volume needed to maintain supply-demand balance and offer greater resilience in the event of a prolonged drought. The advanced treatment processes that will be used in recycling have been used around the world to remove nutrients, pharmaceuticals, and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>A - On developing reservoir storage, reservoirs require a unique set of geological, geomorphological, and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River |

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| | B – Significant risk to Langstone Harbour of developing the effluent recycling plant and deep tunnel shafts needed on the contaminated landfill site at Broadmarsh (Site 72). There are alternative safer and more suitable sites for the plant which avoid unacceptable environmental risk to to the harbour.<br><br>C – The significant visual impact of the proposed Water Recycling Plant at Broadmarsh particularly from around Langstone Harbour.<br><br>D – There is huge concern about the environmental impact of the effluent recycling scheme, including significant impacts associated with the concentrated reject water discharge to the Solent. The reject water from the effluent recycling plant discharged into the Solent will be 4 times more concentrated than the existing sewage effluent discharged. A Southern Water report confirmed it will likely have a significant effect.<br><br>E – Greener and cheaper alternatives are not being properly investigated & brought forward.<br><br>F – Not a sustainable solution, especially building it more than 40km from where the recycled water is needed. The treatment & energy costs to transport the water 365 days a year will be huge. Based on Southern Water's energy use figures customers will be paying more than £3 million a year for the Havant effluent recycling plant to operate 365 days a year, and pump the water to [redacted], even though this option was selected as a drought resource.<br><br>G – Energy security is already a significant concern, developing energy intensive solutions makes things worse for energy security and the planet.<br><br>H – Very expensive solution which is not supported by customers, minimum £1.2 billion, with costs spiralling, making it very hard to believe that it will provide 'best value' for customers.For example, you could build 3 new winter storage reservoirs for the same cost, and they would still be providing a recreational and biodiversity benefit in 200 years, the effluent recycling plants will be redundant in 60 years.<br><br>I – Totally inadequate public consultation before effluent recycling options were selected. Once the [redacted] desalination option was rejected Southern Water should have reviewed all of the alternatives and undertaken a full statutory consultation. Posters should have been put up in all of the areas to be impacted by effluent recycling plants to ensure local communities were made aware of the proposals & consultation. All Southern Water & Portsmouth Water consumers that will be impacted by this significant change to their water supply should have been consulted.<br><br>J – It risks turning people away from tap water due to the lack of trust in the water companies, creating a new used plastic water mountain. | Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>B - Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>C - Portsmouth Harbour WTW is already in existence. The water recycling plant will be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements.<br><br>D – HWTWRP held a consultation on water quality in March 2025. This included details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. Details of this consultation, including the Environmental Water Quality Report, can be found on the project's dedicated website; https://www.hampshirewtwrp.co.uk/consultation.html. Regarding the environmental impact of the effluent recycling scheme, the reject water from the plant discharged into the Solent will be carefully monitored to ensure compliance with environmental standards. The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensures compliance with all discharges.<br><br>E - Regarding selection of options, we carry out an options appraisal exercise when we update our plan every five years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact, etc., in addition to capital and operating costs.<br><br>F - Recycled water options are generally only considered where the river or groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The HWTWRP scheme is designed to provide water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. |

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| | K – Loss of a unique biodiversity opportunity to create a chalk spring fed reservoir. The impacts on reservoir water quality and biodiversity are still unknown. The input of recycled effluent to the reservoir will result in changes to temperature, salinity and geochemistry.<br><br>L – Significant additional risk of pollution from the recycling plant, especially if it is not maintained properly by Southern Water. No independent monitoring of the discharge into the reservoir is planned.<br>Please stop this proposed plan going ahead. | G - Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available.<br><br>H - HWTWRP is being funded in the same way as all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across water supply customers' bills across our region. As with all costs and charges to customers, funding for the Project will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year. The Project is continuing to be developed. We currently estimate that the cost of the Project to each of our water supply customers would be approximately £2.50 a month over a 20-year period..<br><br>I - With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. For more information, see here: https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. All of these activities were publicized on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and stakeholders were directly contacted with information. We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>J – Water at customers' taps will continue to meet strict drinking water quality standards set and maintained by the Drinking Water Inspectoriate. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. We |

| Reference | Feedback | Southern Water Response |
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| | | don't expect customers to buy bottled water when the water coming from their taps will continue to meet strict UK water standards and is many hundreds of times cheaper.<br><br>K - With regard to impacts on biodiversity, water quality in Havant Thicket reservoir is one of the subjects of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Further details and updates can be found on the HWTWRP website; https://www.hampshirewtwrp.co.uk/index.html<br><br>L - No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practices with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir. |
| WRMP537 | I am truly appalled at the plan to put recycled sewage in to local drinking water via the Havant Thicket Reservoir. This novel idea - never before deployed in the UK - fills me with horror and alarm. Why?<br>A. I have lived in Emsworth for 24 years and witnessed lie after lie from Southern Water regarding their discharge of sewage into Chichester Harbour - polluting the AONB and neighbouring beaches. I personally know several people who have developed illness from e-coli whilst swimming in the harbour. At the same time Southern have been one of the worst offenders in terms of rewarding the senior executives. They have one of the worst record of unfixed leaks in the UK to boot. THERE IS ABSOLUTELY NO TRUST LOCALLY IN SOUTHERN WATER'S ABILITY TO DELIVER AND MAINTAIN SUCH A SYSTEM AS THEY PROPOSE..<br><br>B. Southern seem to have been able, it appears, to piggy-back on Portsmouth Waters excellent scheme at Havant Thicket - employing what can only be called a "planning loophole" to circumvent local planning authorities. This is outrageous behaviour. For local people to effectively have no say in the matter is simply a denial of our democratic rights.<br><br>C. I have mentioned leaks above, but will do so again. As we are now firmly in a period of climate change, I am convinced that if leaks were fixed and more reservoir capacity (such as Havant Thicket) was constructed there would be no need for this expensive and energy consuming project. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>A. We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/. For more information about work we are doing to reduce sewerage discharges see https://www.southernwater.co.uk/about-us/our-plans/clean-rivers-and-seas-plan/<br><br>Purified recycled water is water that has gone through a series of advanced treatment techniques before being pumped into a river, lake or reservoir – from where it can be taken and treated to strict drinking water standards before being sent into supply. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>B. As HWTWRP is classified by the Planning Inspectorate as project of national significance, we are required to seek consent from the Secretary of State in the form of a Development Consent Order (DCO). We expect to submit a DCO application to the Planning Inspectorate in 2025. The DCO process puts an emphasis on consultation and early engagement with stakeholders and communities. In this regard, we have carried out three separate consultations on this scheme, the first in 2022, the second in 2024 and the most recent in March 2025. In terms of local engagement for our consultations, in 2022 we ran a six-week non-statutory consultation (eight weeks in 2024), sending out almost 30,000 letters to those in the primary consultation zone around the Project. We |

| Reference | Feedback | Southern Water Response |
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| | | placed half-page colour adverts over three weeks in the Southern Daily Echo, Hampshire Chronicle and The News (Portsmouth), and ran a social media outreach programme that ran throughout the six weeks of the Consultation. We sent posters to parish councils, and other social hubs like churches, community centres and libraries. We also launched a dedicated website which hosted a virtual room. The virtual room afforded the public with the opportunity to view consultation materials without needing to attend an in-person event. We hosted six in person events in proximity to the pipeline corridors and three online sessions across three consecutive weeks at different times to accommodate for different groups. Reference copies of the consultation materials were also located at 9 different deposit points including libraries and community hubs. We made sure to accommodate those who did and did not have access to either the internet or appropriate viewing technology. Further information about these consultations, and the project documentation and updates, are available on the dedicated project website; https://www.hampshirewtwrp.co.uk/index.html<br><br>C. Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined, those conventional sources are no longer available. |
| WRMP538 | I am writing to express my strong objections to the this Southern water WRMP and ask you to reject it outright. | Thank you for reviewing our rdWRMP24 and providing feedback. |

| Reference | Feedback | Southern Water Response |
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| | This plan is an extremely detailed and lengthy document which to the average person in the street is very hard to follow and fully understand which I suspect may be intentional. However, it is clear, even to me, that the proposals by Southern Water (SW) are unrealistic, very expensive and will do nothing to improve the quality of water they will provide and have a huge adverse impact on the environment. The only good proposal is for the formation of the new reservoir in Havant Thicket which is already underway.<br><br>My objections are as follows.<br><br>1) The Havant effluent recycling scheme is a very expensive project both in terms of capital costs and ongoing running costs both in terms of money and energy required to run it. It is my understanding that it will need to run all the time even if the water it produced is not required. The concentrated effluent produced by the plant which will be discharged in the sea will have a large adverse effect on the marine environment which could be damaging to both marine life and to humans who use the sea for whatever reason.<br><br>2) It would be much more ecologically and economically sound to look at alternative ways of managing water. The problem is not that we have enough annual rainfall to meet the demands for water but there is not enough storage capacity available for when it does rain and too much water is lost through leaks in the distribution system and inefficiencies in the use of water both at a household and industrial level. With a sustained educational programme along with incentives for households to store water for non potable uses such as garden watering, car washing and even flushing toilets a huge reduction in water consumption could be made. | We appreciate there may be difficulties with the detailed and lengthy nature of the plan; however, this is unavoidable due to the technical nature of the information required set out in the statutory process and supporting guidance. For those seeking a high-level understanding of our plan, we produced a non-technical summary document which you can view via this link https://waterresources.southernwater.co.uk/find-out-more/<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges.<br><br>1) The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. Both capital and operating costs are factors considered during the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>2) We have considered a number of storage options in the past and will reassess them for WRMP29 including considering locations for new storage reservoirs. However, Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage).<br><br>We are planning to go beyond the government leakage reduction target of 50% and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have a home visits and schools programme which are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water. Regarding household water storage, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included |

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| | | offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| | 3) The proposal to use tankers to bring water from Norway at times of drought is just unbelievable. As a country are we so lacking in expertise that we have to resort to such basic and inefficient means of being able to provide enough water in times f drought. What about the environmental costs of transporting this water, contamination of the water from previous cargoes that tankers ad been carrying and also the introduction of alien species carried in the water. Or will it be so heavily treated that it will not be fit for consumption. | 3) Sea tankering is no longer included in our plan. |
| | | 4) We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. |
| | | 5) In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged eight roadshows across our supply area during October-November: three in our Western area, two in our Central area and three in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. We also undertook five webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. All of these activities were publicised on our website and on social media and a press release regarding the consultation was issued and picked up by major newspapers: The Guardian and The Financial Times.<br><br>The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information. We have received 1,176 responses as part of rdWRMP24 consultation and have met the visibility standards within the guidance. We do welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. |
| | 4) One of the big advantages of being a customer of PORTSMOUTH WATER (PW)is that we enjoy water of a very high quality and standard which would be put in severe jeopardy if SW are allowed to pump their recycled water in the new reservoir at Havant. I am aware that most of the time PW will not draw water from this reservoir but it has been stated that this may be necessary at times of severe water shortage. | The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators which require not only a secure water supply but to provide wider social and environmental benefits.<br><br>Regarding water quality standards, the HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. Further information on water recycling safety and standards is available on the DWI website https://www.dwi.gov.uk/water-recycling/ |
| | 5) SW have been very lax in the public consultation of this plan. Very few meeting have been organised, they are few and far between dates and not necessary geared to the local population. A project of this size which is going to have a profound effect on one of the basic needs of the population needs to brought to the attention of all who will be affected by it. | |

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| | So, in conclusion this plan by Southern Water is ill conceived, smacks of being a huge capital project with little benefit to anyone apart from SW and will be extremely expensive not only in capital and running costs but also have a massive adverse effect both ecologically and on the environment. Although it may ultimately produce more water it will be of much inferior quality to that which SW presently produces and certainly will not come anywhere near the standard of Portsmouth Water.<br><br>Once again, I would urge Defra to reject this plan and instruct Southern water to go away and come up with a much more sustainable and workable one | |
| WRMP539 | Southern Water has a history of distorting, deceiving and lying about the production, waste, storage and use of water and put profit before people.<br><br>This is evidenced by their approach to new housing, which they welcome as it is viewed as a cash cow as they do not put the infrastructure in place to cope with the increased usage.<br><br>They have access to rainwater, a free, clean, hygienic resource but rather than look at this environmentally friendly method of production they have concocted this convoluted scheme to recycle effluent, which is environmentally unfriendly, particularly as it is an expensive fossil-fuel consuming process.<br><br>Given their track record of dumping surplus effluent and grey water, and in covering their tracks,<br><br>I have little confidence in their ability to deliver clean water. Given their track record, what they will deliver will be a more expensive and impure product. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our regulators the Environment Agency, Natural England and Ofwat are independent from Southern Water and they undertake an analysis of our Water Resources Management Plan (WRMP). Their analysis looks at all aspects of the plan, including the options and risks. Our Statement of Response shows the feedback we received from these regulators and how we have responded to it.<br><br>In Hampshire, we already need to find at least 166 million litres of water a day that's not from a river or from an aquifer. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Recycled water options are generally only considered where the river or groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). The HWTWRP scheme is designed to provide water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>Regarding rainfall capture and storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, |

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| | | rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>Regarding the safety and efficacy of water recycling, all water companies' provision of public supply is regulated by the Drinking Water Inspectorate, and further information can be found on their website; https://www.dwi.gov.uk/water-recycling/ |
| WRMP541 | The impact of Southern Waters proposals will not be of any benefit to water users. There should be much more investigation into greener alternatives i.e harvesting of rainwater. I for one will not have any desire to drink so called recycled sewage into water. This will drive more people back towards bottled water which then invokes the undesirable use of plastic bottles. The fact that Southern Water has revised their draft shows they are not producing acceptable proposals. Please do not grant approval to this badly organised profiteering company. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>There are regulatory and statutory requirements for public water supply to be more resilient to droughts and to meet additional demands associated with growth and development. The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to supplement water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. The HWTWRP will help protect these rivers by re-using water that has already been used for public supply, rather than taking more water from the environment during times of low flows.<br><br>Water recycling technology is tried-and-tested in other parts of the world, including Australia, Singapore and the USA, where companies have been recycling wastewater to create a drinking water source for more than 40 years. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP545 | Dear Sir,<br>I fully supported Portsmouths Water initial application for development of Staunton country park and the loss of the ancient woodland for a reservoir storing Raw water and for recreational use. It is logical given the large population on the south coast.<br><br>The application from Southern water though, to use this reservoir for effluent recycling for the purpose of managing 'shortfalls in drought emergencies' and supply to the Southampton area I strongly oppose for the following reasons:<br><br>This is not the most cost effective method because:<br>1. It creates create huge infrastructure - with massive initial, carbon and environmental damage in placing the pipe work and pumping stations.<br>2. Ongoing maintenance and running costs - pumping continuously for occasional drought emergencies is NOT cost effective or green - wherever the electricity is generated.<br>3. Higher than necessary increase in bills for users of the services due to the poor choice of managing drought emergencies. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note your objection to the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and set out our repsonse to your concerns below;<br><br>1. Regarding the carbon and environmental impact of large infrastructure schemes; we are undertaking a range of environmental assessments, as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk/index.html. The report details the preliminary findings of our environmental assessments based on the information available to date. The environmental assessments will continue to be updated and will be documented in an Environmental Statement that will be submitted as part of the Development Consent Order application. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce |

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| | 4. It has no impact on effluent going in to Langston harbour/ the solent as the waste from the pumped effluent is still discharged into the area of special scientific interest but in a more concentrated form<br>5. It has no impact on the ability to deal with storm overflows.<br>6. It risks increasing the usage of bottled water locally due to peoples concerns over recycled effluent.<br><br>The only positive that this would bring is due to the infrastructure and running costs. Southern water would have a higher company value - and therefore potential higher returns for company management and investors. This should not be the priority here.<br><br>Priorities that should be addressed as an alternative:<br>• Improve SW leakage of supply pipes currently running at around 20% - this is a massive loss and would have a significant impact on abstraction<br>• Develop new winter storage reservoirs nearer the area of need - low environmental impact and carbon neutral<br>• Utilise underground aquifers to store winter water - and use the natural 'water cycle' as opposed to RO process.<br>• Look to use of grey water for use in new housing for toilets etc.<br>• Roll out smart meters/ make fitting mandatory to prevent wastage of water.<br><br>All of the above would satisfy the customers needs and assuage their concerns. It would of course not make Southern water a more valuable company as their assets wouldn't increase!<br><br>DEFRA must act on the customers needs, but also think in this environmental emergency times of what has minimal impact and has a minimal carbon impact. | our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>2. There are operational and maintenance costs involved with any new and existing infrastructure, which are necessary to continue to meet water supply demands now and in the future. New limits on the amount of water we can take from the Test and Itchen for public supply have been introduced to protect these rivers and their ecosystems. Where previously we would have taken water from the environment, we now need to use alternative means such as water recycling. The selection of HWTWRP followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>3. HWTWRP is being funded by Southern Water. Like all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across water supply customers' bills across our region. As with all our costs and charges to customers, funding for HWTWRP will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year.<br><br>4. Regarding impacts on water bodies, a further consultation on water quality has been held in 2025. This includes details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The Environmental Water Quality Report, in summary, shows that changes in water quality in Langstone Harbour would be small and are not expected to have any impact on biodiversity. The report also confirms that reject water from the water recycling process, which will be released into the Solent, is unlikely to affect water quality or the biodiversity of the Solent. The full report is available to download here https://www.hampshirewtwrp.co.uk/EnvironmentalWaterQualityReport.pdf<br><br>5. Storm overflows are associated with the functioning of sewerage network, which is not within the remit of the Water Resources Management Plan (WRMP) – for information on how Southern Water is tackling storm overflows see our Drainage and Wastewater Management Plan (DWMP) https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ and https://www.southernwater.co.uk/about-us/our-plans/clean-rivers-and-seas-plan/<br><br>6. Water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators |

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| | | and environmental organisations to develop the plans and ensure this. We don't expect customers to buy bottled water when the water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>In terms of alternatives proposed to HWTWRP;<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030. |
| WRMP546 | I am writing to express my serious concerns about Southern Water's (SW) Revised Water Resources Management Plan (WRMP). As a local resident, I believe the proposals outlined in the plan pose unacceptable environmental risks and place an undue financial burden on our community.<br><br>A key element of the plan involves the construction of an effluent recycling plant at Broadmarsh, Havant, located on a former landfill site. This raises significant environmental concerns, particularly the risk of leachate contaminating Langstone Harbour during construction. Furthermore, the scheme involves pumping recycled water to Havant Thicket Reservoir and | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | transporting it over 40 kilometers to [redacted]. The projected cost of this initiative has already reached £1.2 billion and continues to escalate.<br><br>Southern Water's failure to address its persistent leakage issues further undermines confidence in the plan. Currently, the company loses 100 million liters of treated water daily—19% of its total supply. By 2050, their target is to reduce leakage by only 53%, falling well short of the 70% reduction that industry experts believe is achievable.<br><br>The inclusion of impractical and unsustainable alternatives, such as importing water from Norway, is another point of concern. This proposal, previously dismissed by Southern Water itself as costly and environmentally hazardous, suggests a lack of credible solutions. Meanwhile, viable and sustainable options, such as expanding reservoirs, utilizing aquifer storage, and improving network efficiency, have been largely dismissed without sufficient consideration.<br><br>Additionally, the prospect of a merger between Portsmouth Water and Southern Water raises fears of significant price increases for local residents, who would be expected to finance these costly and flawed projects.<br><br>I urge you to closely examine Southern Water's WRMP and advocate for a more sustainable and responsible approach to water resource management. The plan must prioritize environmental protection, address inefficiencies in the current system, and deliver solutions that serve the long-term interests of the community.<br><br>Thank you for your time and consideration. I look forward to hearing how you intend to represent these concerns to the relevant authorities. | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Southern Water and Portsmouth Water are entirely separate and independent companies but have commercial arrangements to transfer water across their respective boundaries. Portsmouth Water is a 'Water Only Company' meaning that within its area, it provides only potable water services. Southern Water provides wastewater services in the area Portsmouth Water supplies for water. Southern Water is not discussing changes to the current licence to operate arrangements and company mergers are not considered to be part of this consultation process. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is being funded by Southern Water. Like all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across our own water supply customers' bills across our region. As with all our costs and charges to customers, funding for HWTWRP will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year.<br><br>The need for HWTWRP is driven by reductions in the amount of water we can take from the Test and Itchen rivers, which means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water to help keep taps and rivers flowing. HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources |

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| | | driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan. |
| WRMP547 | I am writing to register my strong objection to the Hampshire effluent recycling scheme. Where was the consultation about this major issue? The deadline has crept up on us with very little information or communication from Southern Water at all.<br><br>The use of recycled effluent to boost the water supply has one real aim only; to maximise profits for Southern Water. This of course continues the long track record of Southern Water in putting the interests of its shareholders before those of we, the consumers. Even after the fines of recent years and the dramatic increase in publicity over water quality issues nationally, discharges into Chichester Harbour from Budd's Farm and other treatment works in the region continue at alarming levels. Given all this, it is hard to have any confidence in Southern Water's ability to develop and manage a complex effluent treatment plant without more real risks to the environment.<br><br>Meanwhile, Southern Water is avoiding tackling the logical, sustainable solution. Why is it investing so little in dealing with the huge levels of water leakage from the current system? This again is something that has been going on for years. Reducing leakage dramatically and improving rainfall storage are a vastly more sustainable route. As with all the water companies, Southern Water says that bills would need to rise significantly to fund such an investment, but where's the recourse for customers for the huge underinvestment that has been going on for years?<br><br>Successive Governments and MPs - including the area's MPs past and (in some cases) present have seemingly done nothing to alleviate conditions. I urge that the recycling scheme be rejected and a better, sustainable solution be put in its place. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our rdWRMP24 consultation involved 8 roadshows throughout our supply area, as well as 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation. We sent out a press release regarding the consultation, which was picked up by major newspapers. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers, providing a link to our dedicated consultation website where interested parties would be able to view, download and provide feedback on our plans throughout the duration of the consultation period. All of these activities were publicised on our website and on social media. Previous respondents and local MPs and Stakeholders were directly contacted with information. The Hampshire Water Transfer and Water Recycling project (HWTWRP) is also holding its own project-specific consultations, separately to the WRMP, and details can be found at https://www.hampshirewtwrp.co.uk/<br><br>We have fulfilled the expectations from planning guidance regarding our consultation's visibility and accessibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Regarding cost of HWTWRP, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent having been completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. It should also be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017.<br><br>Regarding investment in leakage reduction, our capital programmes are delivered in line with our regulatory commitments and operational needs. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period.<br><br>Regarding sustainability, the need for HWTWRP is driven by reductions in the amount of water we can take from the Test and Itchen rivers, which means we have a shortfall of some 192 million litres of water a day during a drought. These ecologically-sensitive chalk streams |

| Reference | Feedback | Southern Water Response |
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| | | support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water to help keep taps and rivers flowing. HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>Regarding rainfall storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan. |
| WRMP591 | To whom it may concern<br><br>I strongly object to Southern Water's proposed use of recycled sewage effluent, the building of a treatment plant at Budd's Farm and the storage of its output in the Havant Thicket reservoir.<br>We get plenty of rain in this country and the above proposal is totally unnecessary, more suited to desert countries. Our winter rainfall should be stored in new reservoirs and dedicated aquifers, providing a more natural supply of drinking water.<br>Southern Water's scheme will be extremely expensive to build and operate, and looks set to benefit shareholders at the public's expense. There are cheaper and more natural alternatives.<br>Nearly 20% of Southern Water's supply is lost to leaks. Instead of the Budd's Farm scheme, Southern Water should prioritise fixing the leaks and maintaining/renewing the water mains network. It is far better to maximise the use of readily available, ready treated drinking water, than to spend colossal sums on creating more to be leaked away.<br>The scheme inherently risks further pollution of Langstone Harbour and nearby waters. I live near Chichester Harbour, just a few miles from Budd's Farm, and have direct experience of the deterioration in water quality in recent years. The development should not be permitted: Chichester Harbour is a designated National Landscape and has an important leisure industry to protect; the Solent is the UK's premier sailing waters. Southern Water cannot be trusted with this scheme.<br>For the reasons above – and many more – it must not be allowed to go ahead.<br><br>Yours faithfully | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see this link<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver |

| Reference | Feedback | Southern Water Response |
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| | | our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP604 | I cannot see the need for this comprehensive plan including 40Km pipes being laid, whose life expectance is estimated to be 60years. All for this to be maintained by the incompetent organisation Soutern Water, who have been quite willing to empty sewage in the Solent.<br><br>Apparently, we have more than enough rain water for all our needs. When I read that more pollution will be dumped into the Solent as a result of this expensive scheme, that does not seem right! What would happen to our water supply in the event of a failure of this complex system? Could Souther Water be counted on to maintain a water supply. HAVING SEEN THE PAST PERFORMANCE OF SOUTHERN WATER, I HAVE NO CONFIDENCE IN SOUTHERN WATER AT ALL.<br><br>Why are they not repairing existing pipes which are leaking? Why not build alternative water storage systems?<br><br>Having see the video by a local member has made me realise that they have a better understanding than Souther Water.<br><br>Why has all this been kept out of thew public view? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10-20 years of the electrical and mechanical plant.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas__final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non- |

| Reference | Feedback | Southern Water Response |
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| | | targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP612 | I strongly oppose Southern Water's plan to recycle treated waste into the drinking water supply network. I ask that Defra reject the plan. At the very least Defra must force Southern Water to defend the reasoning behind their selection of a solution that combines high cost, high risk, greatest environmental impact and apparently a large profit.<br><br>My overriding concern is that given Southern Water's track record and their proposed use of technology not yet used in the UK they cannot be trusted to safely implement and operate their proposed approach. A further concern is that though solid matter can be filtered out I understand that it is difficult to completely remove traces of drugs (medical and recreational), heavy metals, hormones and viruses.<br><br>How long would it be before the drinking water supply becomes contaminated? How would the issue be identified? Probably by residents falling sick rather than Southern Water being aware. Once this has happened is it possible to fully clean the supply chain, including a large reservoir, once contaminated? Risk of contamination also applies to the Langstone harbour discharges. It must be remembered that Langstone links into Chichester Harbour as well as the Solent.<br><br>A big project such as the one proposed is high risk, will take a long time to implement and will no doubt be subject to delays. So, it will be a long time before any of its supposed benefits are realised. It would be much better to identify a number of lower risk small/medium projects many of which could be delivered more quickly. This might include increased focus on leakage.<br><br>The original planning permission for Havant Thicket, agreed after some debate, related to storage of fresh water. I am appalled that this could be changed retrospectively apparently with no reference to HBC's planning system and residents wishes. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>All of the hormones tested in our trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all compounds are rejected by reverse osmosis membranes, for the compounds we tested, concentrations recorded were an order of magnitude lower than those found in wastewater; and in some cases, lower than levels found in natural water systems globally. Where compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine, which were measured in the order of low micrograms per litre). The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We consider all options, regardless of size, as part of our options appraisal process. However, due to the scale of the supply-demand balance deficits and the stringent Environmental Destination targets set by the Government, we must pursue large-scale strategic solutions. Environmental sustainability is a key criterion for including options in our plan.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. This includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We are also exploring emerging technologies that may enable quicker or greater leakage reductions. |

| Reference | Feedback | Southern Water Response |
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| | | Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |
| WRMP614 | Southern Water has a disgraceful record of discharging sewage into the South. Coast and now they want to use Portsmouth Water's Reservoir to deal with what they are paid to do.<br><br>There is no mention in the application of rainwater collection which would be a cheaper and more effective way of providing water locally. The idea they have would make them greater sums of money and would not provide a clean water supply and they would continue to discharge effluent into the harbours.<br><br>Their plan ignores the link between fossil fuels and construction and climate change because their plan commits us to using more climate destroying fuel.<br>There is little evidence that Southern Water cares in any way for the population that it should serve and it continues to over pay its shareholders and CEOs.<br><br>Please DEFRA, demand that SW looks at rain water collection and is not allowed to continue with this erroneous and wildly expensive plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government’s legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, |

| Reference | Feedback | Southern Water Response |
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| | | which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting from April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP629 | For the attention of The Secretary of State (Defra)<br>Water Resources Management Plan Consultation (Southern Water)<br>Water Resources<br>Department for Environment, Food and Rural Affairs<br>Seacole 3rd Floor<br>2 Marsham Street<br>LONDON<br>SW1P 4DF<br><br>27 November 2024<br><br>Dear Sir,<br><br>I write to object to Southern Water's Water Resources Management Plan [WRMP] and call on DEFRA to reject it.<br><br>Without trawling through all the technical arguments against the scheme, which you will be fully aware of, the fact of the matter is that the Effluent Recycling Scheme that would return recycled and 'cleansed' water to The Havant Thicket reservoir is<br>• poorly conceived - inadequate consideration of alternatives,<br>• poor value for money impacting customers as well as shareholders,<br>• hurriedly imposed on the pre-existing reservoir plan - very poor local engagement with communities, councils and other bodies<br>• not to be trusted - it is proposed by a company that has a poor environmental record of the control and management of effluent discharge<br>• more suited to the geography of land that has sparse rainfall<br>I fail to be convinced that it is necessary to transport treated effluent 40 miles and return it to a newly constructed reservoir in a country that stores only 1% of its rainfall. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan. |

| Reference | Feedback | Southern Water Response |
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| | The unfortunate legacy of Southern Water's past actions means that its own reservoir of TRUST is at danger levels.<br><br>To quote but one instance from only 3 years ago [Guardian Newspapers]: https://www.theguardian.com/environment/2021/jul/06/southern-water-dumped-raw-sewage-into-sea-for-years#:~:text=There%20has%20been%20considerable%20financial,which%20(8%2C400)%20were%20illegal.<br><br>"Southern Water discharged enormous volumes of raw sewage into protected coastal waters for nearly six years causing “very considerable environmental damage” because it was cheaper than treating it, a court has heard.<br>This was “the worst case brought by the Environment Agency in its history”, the court was told.<br>Southern Water had acted “deliberately” and had reaped “considerable financial advantage” by allowing the discharges." | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>With regard to coastal waters, A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP631 | Hello Defra<br><br>I am extremely concerned about the proposal to recycle sewage effluence locally. I have a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management.<br><br>I am surprised that it’s only now at the 11th hour that I have become aware of this issue. There has been totally inadequate public consultation before this effluent recycling option was chosen.<br><br>The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers. We get plenty of rain in winter, Southern Water should be developing solutions which store that free natural water for use in dry summers.<br><br>The impacts on reservoir water quality and biodiversity are still unknown huge concern about the environmental impact of the effluent recycling scheme, including significant impacts associated with the concentrated reject water discharge to the Solent<br><br>Greener and cheaper alternatives are not being properly investigated & brought forward energy intensive solutions makes things worse for energy security and the planet. This is a very expensive solution which is not supported by customers. I understand it’s costs will be a minimum of £1.2 billion, with costs spiralling, making it very hard to believe that it will provide ‘best value’ flet alone the most sympathetic to the needs of the environment and it’s customers.<br><br>Thank you for considering my concerns | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) on in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |

| Reference | Feedback | Southern Water Response |
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| | Yours sincerely | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding accumulation of substances in Havant Thicket reservoir, the advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID) gated process. |
| WRMP640 | As a resident of Havant Borough I strongly object to SW's project for transfer and recycling water in our region on the following counts:-<br><br>1) Rain, which is expected to increase with climate change should not be allowed to run to waste but should be stored in aquifers or new reservoirs for use in dry periods.<br><br>2) SW should mend leaks quicker as their current rate is unacceptable.<br><br>3) The proposed recycling plant should not be built at Broadmarsh on the old, contaminated landfill site, which would risk contaminating Langstone Harbour.<br><br>4) Water extraction should be closer to the tidal limit to reduce need for reform. And it should be nearer to where water is needed to avoid long pipelines detrimental to residents and wildlife.<br><br>5) Although recycled water would be safe to drink, the different taste would, or could, cause customers to use bottled water, thus creating a high carbon footprint associated with manufacture, transport, not to mention huge problem with plastic bottles waste. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | In view of the above, I urge you at Defra to insist SW adopt a more sustainable and environment-friendly plan. They do not seem to have considered other alternatives. Please insist they come up with something better.<br><br>Thankyou, | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP646 | Dear DEFRA<br><br>I am writing to you to record my objection to the above plan by Southern Water.<br><br>I am currently a customer of the Portsmouth Water Company living in Emsworth, Hampshire and I recognise the pressure that is being put on water resources in this area by the increasing population. I also understand that water companies have to build resilience into their plans to | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |

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| | guard against water shortages during summer droughts. That is why Portsmouth Water acquired land to the north of Havant and obtained planning permission to build a new reservoir to be filled by surface runoff water and water from the chalk aquifer. As a customer of the company I am very happy to be supplied with drinking water from these particular sources.<br><br>However, this situation has now been hijacked by Southern Water who, according to their latest plan quoted above, intend to supplement the water in the reservoir with treated effluent coming from their treatment works at [redacted]. This treatment consists of a variety of physical, biological and chemical processes. I believe that the water will be further treated with chemicals once it has been extracted from the reservoir before it is supplied to customers. Although I am not a Southern Water customer for drinking water, if a drought situation arises in the future then Portsmouth Water will be supplying my water from the same source. I would not be happy with this. The more processes and interventions that are required to treat water derived from effluent the greater is the risk for something to go wrong.<br><br>It strikes me that there is a parallel here with the rise of ultra processed food and the consequences of introducing chemical additives leading to an increase in disease and poor health in the population. Southern Water is condemning us to drinking ultra processed water through their plan. We do not live in a desert here. There is abundant water falling on Hampshire during the winter months. A better plan would be to find ways of capturing and storing the rainfall we need, working in tandem with nature and the environment. | Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan. |
| WRMP684 | My wife and I object to your plans to recycle sewage effluent to top up our water supply in Havant. The money would be better used to replace old mains where leakage means that so much water is going to waste. We realise that you are doing this already, but to a much smaller extent and speed than what is needed. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We note your objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP685 | I write to strongly oppose the use of recycled effluent water by Southern Water as drinking water by residents of Havant, where my family live. It is a foolhardy project, based on generating profit and not concerned with the wellbeing of residents. Southern Water has the worst possible reputation for being a responsible organisation and should concentrate instead on mending leaks, investing in infrastructure and taking care of the environment. Public health and wellbeing should always take precedence over the generation of profit. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We note your objection to the use of recycled water in Havant Thicket. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We need to look at factors such as cost, volume of water that an option can provide, its resilience to climate change, environmental impact etc. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried |

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| | | out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP686 | When our new reservoir was first discussed it was proposed that it would be filled by the many local springs which would have given us clean, pristine drinking water… the best for the local community.<br>The fact that Southern Water, one of our worst polluters, is intending to solve their problems by pumping sewage into the reservoir ( giving them a £45,000,000 profit) is a lazy and greedy way of running their business. It would be much better to spend more time and money on fixing their pipes which leak huge amounts of fresh water every day, and also in finding more sustainable methods of waste disposal . There are better and cheaper options which have been researched, but these would not bring in the profits required by Southern Water. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project |

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| | Climate change seems to be bringing us increased rainfall and yet we collect only 1% of this natural resource. We could be using this more efficiently.<br>We are blessed in our area with abundant natural water sources, why would we choose to pollute this amazing gift? Let's stick to the initial plan which will provide fresh, clean drinkable water for us all. | (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history.<br><br>We acknowledge your concerns about leakage and agree that reducing it is a priority. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. |
| WRMP688 | Dear DEFRA,<br><br>We are writing to object to Southern Water's effluent recycling proposal. We ask you to reject it and oblige Southern Water to change its plans and take us down a more sustainable, less damaging and costly path for the future, using the alternatives that already exist. We ask too that the government makes changes to the water company funding mechanism to support that. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought |

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| | Alternatives: We need more sustainable solutions that work with climate change and are low energy e.g. storage options developed closer to where water is needed, to reduce the need for long pipelines and environmentally damaging, energy-rich infrastructure projects, with more reservoirs and confined aquifers to capture the heavy winter rainfall that is predicted to come with climate change. This can then be used in dry summer months. (At the moment we only capture 1% of rainfall in the UK, so there is ample scope to improve.) Capturing rainfall in this way would also help to reduce flooding. It could bring recreational and biodiversity benefits too and make use of existing, tried and tested, technology. Effluent recycling is still an unknown in this country and consumers have not had the opportunity to properly study and discuss the alternatives.<br><br>If borehole abstractions were moved closer to the tidal limit on the River Test and River Itchen, this would reduce the priority for abstraction reform which is driving the need for Southern Water to promote and pursue effluent recycling in the first place. This is a simple, achievable solution and is supported by an ex Managing Director of Southern Water, who is not in favour of effluent recycling. It would only require a tunnel and approximately 9km of pipeline on the River Itchen, for example, to get water to [redacted] instead of a minimum of 40km for Southern Water's proposed effluent recycling scheme. This would mean that the whole of the freshwater section of the river would be protected from abstraction, which would restore natural flows, including in a drought.<br><br>These solutions would enable Southern Water to protect the environment and adopt a strategy that is far in keeping with their commitment to be carbon neutral by 2030. The effluent recycling scheme would use a huge amount of energy. How can that be compatible with Southern Water's aim to be carbon neutral. Surely it undermines rather than supports that. We feel that such a plan is not only costly and unnecessary but irresponsible in our current situation as a nation that already uses vast energy resources and contributes significantly to global warming.<br><br>Risks and costs: We believe it would be hugely costly (for the environment and consumers) and present unacceptable risks if this project went ahead (see below). It is also unnecessary as there are suitable alternatives available. However, the problem is that these have not been publicised or, we believe, given full and proper consideration by Southern Water. Instead, they stand to make huge sums of money for themselves and their investors (approximately £45m) if the effluent recycling scheme goes ahead. They need to be obliged to consider the alternatives; and we need proper, well-informed and public debate.<br><br>Consumers will face large increases in their bills (£3m to be met for the energy costs alone) if this project went ahead at a time when many are already struggling to pay their energy bills. There will also be massive and unacceptable risks to the environment and natural world, which are potentially irreversible. Our drinking water would taste different too, which could lead to plastic bottle mountains if people didn't trust the new water. Research has shown customers do not want effluent recycling, so this is a real risk. We need to have a proper consultation with full and public debate and open consideration of the alternatives. | and provide a more reliable and sustainable source of water in the future. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term |

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| | Southern Water have a very poor track record of treatment plant and pumping station failures. They have been prosecuted for pollution incidents and not taking prompt action to rectify problems. Given their failure in respect of managing existing technology, there is very little evidence to suggest that they can be trusted to manage the hugely complex systems involved in the effluent recycling scheme.<br><br>Beside the damage to the environment with all the new works proposed, huge costs and carbon emissions, the choice of the recycling plant site at Havant as part of the effluent recycling proposals is also very concerning.<br><br>This is a contaminated landfill site with no engineered lining. The effluent recycling proposal would mean drilling down into it to put in piles and tunnels. It would carry a significant risk of leachate. Given this vulnerability, it feels almost inevitable that the project would have a negative environmental impact on the harbour and surrounding area, as well as being hugely costly financially to develop and maintain. We don't need it! If all else fails and Southern Water's effluent recycling proposal were to be accepted, despite all the objections, they must be told to find an alternative site for the recycling plant.<br><br>As already stated, we feel that we need a plan that strives to develop more sustainable solutions first. It is also vital for Southern Water to be obliged to increase its targets for maintenance and fixing leaks and that this is given high priority. 19% of the water that customers pay to have treated is currently lost to leakage (100m litres per day) with a further 3% lost before reaching the treatment works. This problem is not being addressed fast enough - perhaps because 'maintenance' does not attract significant funding or profits. If the government changed the water industry funding mechanism so that maintenance became a priority and it was profitable for water companies to increase the rate at which they fix leaks and replace ageing pipe networks, this would benefit everyone - them, the consumer and the environment. It would make a huge saving of resources possible. The mechanism we have favours infrastructure heavy solutions instead. That can't be right. We need this to change and for government to recognise that and make the change.<br><br>We are experiencing climate change and need to find solutions that work with that. We need to make use of existing resources rather than incurring huge costs and using vast amounts of energy and untested technology in sensitive areas, with all the 'unknowns' and risks associated with the works required to establish and maintain effluent recycling works. Please reject this proposal and make Southern Water listen and consider the alternatives so that they put the environment first, before profit.<br><br>Yours sincerely, | decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>With regard to cost, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, starting from April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br>The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | The investment model that we utilise needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP696 | Re: Southern Water Public Consultation<br><br>I am writing as a resident on Hayling Island. I have heard that there are approximately twenty fresh water natural springs in Havant. Along the A259, the coast road, there are many place names with the word 'bourn(e)'which according to the Collins dictionary states: in British English, mainly southern England a stream, especially an intermittent one in chalk areas. In American English, bourn or bourne – a brook or stream.<br><br>It seems that fresh water is abundant, don't let it all go into the sea.<br>Definitely, it's a crime to mix it with recycled sewage effluent and then to pump it into our taps. I drink tap water every day. I do not drink tea or coffee. I do put the tap water through a Brita filter jug at home. What would I have to do, I would have to buy bottled water, water in plastic bottles.<br><br>If you mention the word 'reservoir' – like the one at Havant Thicket, especially at a time when we have had a lot of dry days in the summer, and there is a threat of limited use of clean water, to have a reservoir sounds like a great idea, but Southern Water have another idea. People don't imagine that the reservoir is also going to be storing recycled sewage effluent. No, it's the word 'reservoir' which people think is a great idea. The recycled sewage effluent - along with natural spring water – is what would be pumped into your home as drinking water. I don't understand why this is considered a solution. There must be money in it or why bother? We are about to enter 2025 and there is plenty of natural clean water and rain fall available to us in this area. The earth is providing it for us to use. We need to harness it properly before it goes into the sea. The cost of this scheme from Southern Water to pump recycled sewage water to Havant reservoir (which is still in construction stage) and into our homes for us to drink, along with a 41km pipeline must be considerable! According to the proposal, it is a 1.2billion scheme which we would ultimately be paying for, it is not necessary.<br><br>Yours faithfully. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regards to your suggestion of using coastal spring water, the company Water Resource Zones do not always extend to the coast as might be expected (e.g. especially in Hampshire), as the resource zones are distinct and separate from the physical infrastructure of the Water Supply Zones. Additionally, many coastal springs are often relatively small from a public supply perspective, and such spring discharges typically show a strong seasonality and decline significantly in summer periods. Or abstractions at these locations can be more prone to saline intrusion. So coastal springs general tend to offer poorer drought resilience and security of supply. Similarly, associated coastal wetland environments dependant on such smaller springs will also be drought sensitive. However, such options (or those available within our water resource zones) will continue to be reviewed and reconsidered in future water plans.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the |

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| | | next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. Our PR24 Price Review is being redetermined by the CMA.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see: this link |
| WRMP700 | I am replying to the consultation relating to Southern Water's proposed Water Resources Management Plan.<br>I made comments about this some time ago and I know that their proposals have met with a great deal of opposition from all corners of Hampshire. To be honest, I feel that the consultation exercise is just a sham in order to make it appear that the views of local people, and experts, have been listened to. There are so many things that are wrong with the Plan that I don't have the time or energy to try and list them all. However here are some of my main concerns.<br><br>1. Southern Water has not seriously considered more cost-effective and sustainable solutions first, such as collecting more rainwater during the winter which would help to reduce flooding and which is now more of a problem than drought. This would also improve biodiversity and it is not nearly as costly as what is being proposed.<br><br>2. Southern Water is proposing to use a new effluent recycling process that has not been used in the UK before for public water supplies. If Southern Water can't manage to look after the supply system that it already has in place, how can we have faith that they will be able to cope with a far more complex process? Or, are they really in favour of this scheme because it will make a lot of money for them? Southern Water has been prosecuted many, many times for pollution incidents, massive leakage events, and a poor record regarding its treatment plants. If they get permission for this new, very complicated, process who will have to pay to put things right when things go wrong – the consumers, of course, and never the company.<br><br>3. Southern Water's strategy is the opposite of climate friendly or sustainable. Building and running the scheme will have an extremely high carbon footprint. Did they seriously consider any more sustainable solutions? For example, look at storage options that are closer to home? | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>With regard to possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour. |

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| | 4. I am particularly concerned that the proposed recycling plant at Havant will be built on an already contaminated landfill waste site. There is an enormous risk of damage and contamination to Langstone Harbour from the initial building work and the ongoing running of the plant.<br><br>These are just a few of my concerns. I am not an expert but I know experts who agree that this Plan is not the right answer. Southern Water should start by doing what they should already be doing: fixing leaks, replacing pipework that is no longer fit for purpose, etc. etc. | Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in |

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| | | Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP703 | In response to the revised water resources management plan proposed by Southern Water, I have read the proposals and strongly wish that Southern Water would take their heads out of the sand and be more realistic with their water management plan.<br><br>NORWAY???!!<br><br>I honestly thought this was a joke! Having lived in Yorkshire for several years I saw a reservoir being filled with bottled water in an emergency. How utterly ridiculous that was, but to bring it from Norway with all the environmental and natural contamination issues is simply madness.<br><br>The effluent recycling scheme is also extremely expensive, damaging to the environment and simply disgusting. Surely there are better ways, perhaps developing existing infrastructure?<br><br>Why can't they focus on the structure they have currently in place and fix the leaks, instead of creating more problems and possibilities of environmental damage on a huge scale, not to mention hikes to customer bills?<br><br>Leave the chalk streams alone, help customers to save water using water butts and other incentives, educate customers both domestic and commercial in water schemes, just don't throw good money after bad with half thought out, hair brained, short term, extremely risky and costly plans. If we are so short of water, why is there flooding? Can this water not be saved?<br><br>They must be made to rethink the plans. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised |

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| | | rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP712 | I wish the following comments to be taken into consideration. I strongly object to the revised plan.<br><br>1) This plan details the construction of a costly, environmentally damaging effluent recycling facility plus the need to transport the water 40 km away to [redacted]. This facility would have to run all day, every day, and every year even at times when water is plentiful. The carbon footprint alone is huge and the risk of contamination from chemicals as well as a leak into the new reservoir cannot be ruled out. This is not a long term sustainable solution.<br>2) I sail in Langstone Harbour and so am familiar with the discharge of untreated sewage into the harbour already. How can I trust a firm to operate a technically complex effluent recycling scheme so close to the harbour on a contaminated landfill site when they are already polluting the environment, sometimes for weeks at a time.<br>3) Why haven't Southern Water made greater efforts to reduce leakage of treated water that we have already paid for? Why not do that first before investing in a costly, environmentally damaging scheme. Once that work is completed, then estimate what is needed. Fix the underlying problems first please.<br>4) The proposal to tanker water in from Norway is absurd. The risks of importing non native species would be high and the water itself is incompatible. This water would have to be treated to be of the correct quality. This is short term thinking at its very worst.<br>5) Southern Water states that they are planning for a once in 500 year event. For that they will build a costly, damaging facility that may not even be required instead of fixing existing problems.<br>6) Little effort is put into education of households to reduce their water consumption. Perhaps Southern Water do not see that as a high priority given that it may reduce their profits?<br><br>In conclusion, it seems to me that Southern Water is planning a major investment in a facility that may not be required instead of looking at less expensive, environmentally sound local solutions. The cost for this would be passed onto the consumer. It seems to me that Southern Water is looking at profits and pleasing their shareholders, rather than their customers.<br><br>As stated before I strongly OBJECT to the revised plan. I have copied in my MP so that he is aware. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>With regard to possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>With regard to the viability of sea tankering, this option is no longer included in our plan..<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies.<br><br>Our home visits programme and schools programme are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company |

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| | | can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP720 | Defra,<br><br>As a resident of Havant I object to the proposed revised Southern Water plan . They current appear to be unable to maintain their existing infrastructure to a reasonable standard and I believe that this should be addresses before they are allowed to proceed with any major future plans. Maintaining the existing infrastructure properly could result in a great reduction in lost clean water and should be their priority. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP724 | I am objecting to Southern Water's WRMP plans because there has been inadequate consultation on the nature of the proposed project. As a resident of Havant living in close proximity to the proposed reservoir and water recycling plant, I attended some of the events held locally to explain the scheme. I was surprised to find that this scheme will bring no benefits to local people as the water to be produced will be pumped for consumption miles inland of here.<br><br>Having collected the documentation for the official consultation process I found it far too technical to complete. In order to provide feedback you were expected to wade through multiple pages of information before you could give a response. I'm sure the complexity of the process has reduced the level of meaningful feedback received and may have given the impression that there are few objections as a result. It is the process which is at fault and the company has not made a meaningful effort to contact ALL the people in Havant that are affected by this proposed development to obtain their feedback.<br>Furthermore, there are alternative strategies that Southern Water should be focusing on instead:<br>• Reducing the amount of leakage in the system which loses almost a fifth of the water being treated.<br>• Reducing the pollution caused in the rivers and seas by the inefficient processes used to manage sewage.<br>• Improving the collection of rainwater rather than engaging in an expensive project to recycle dirty water.<br>• Investing in more sustainable solutions rather than consuming more resources on a huge and disruptive construction project.<br>I trust these objections will be considered in deciding the future of this project. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>"https://waterresources.southernwater.co.uk/find-out-more/" Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. |

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| | | We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | | Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. |
| WRMP725 | To whom it may concern,<br>I would like to record my serious concerns about Southern Water's plans for a new effluent processing plant. I have outlined these concerns below:<br><br>1. The lack of consultation time.<br>This seems rushed. Most people lead busy lives and will not have appreciated the scale and scope of the planned works.<br><br>2. The lack of investment in fixing leaks<br>It is astonishing how much water is lost from leaks in the current infrastructure. Why not fix the bucket with a hole in it rather than buying a new bucket?<br><br>3. There is plenty of rain<br>Why don't we collect more of the rain that falls rather than waste energy recycling effluent?<br><br>4. The effect on the environment | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>**1).** In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non- |

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| | Reports have suggested that the proposed plans will be very damaging from a carbon footprint point of view. Other options are available. For example , why not put the storage of water nearer to where the water is needed?<br><br>5. Profit motive<br>Southern Water is a business. It is loyal to its shareholders not the consumers. We as consumers have no choice where we get our water from, or how it is disposed of. The priority for Southern Water is to make money. Inevitably the environment takes a very poor second place in the evaluation of projects like this. The dismal record of Southern Water and the number of pollution incidents would surely set alarm bells ringing. Perhaps they will be successful in persuading the powers that be that this time they're going to get everything right. Personally, I doubt it.<br><br>I appreciate that this is a brief response to a massively complex question. I also recognise that there are discussions and debates still outstanding. That is why my first point is so important.<br><br>Please take my concerns seriously<br>Public confidence in hitherto respected organisations is at rock bottom. Please do not rush to add further fuel for the cynics. | targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We have received 1,176 responses as part of rdWRMP24 consultation. Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>**2).** The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>**3).** Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>**4).** As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |

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| | | **5).** In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>With regards to your point about public confidence in Southern Water: We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. See link: Our Business Turnaround Plan \| Southern Water |
| WRMP728 | Good afternoon<br>I should like to register my opposition to Southern Water's proposed recycling of sewage effluent at [redacted] to top up our water supply and their proposal to build a treatment plant next to the coast at Broadmarsh where pollution already leaks out into the harbours around Emsworth and Langstone.<br>The proposed cost of up to £1.2 billion is outrageous and money would be better spent at looking at more sustainable ways to collect and store winter rain and investigate a faster way to renew water mains and replace ageing pipework. This must surely be a more environmental and sustainable way to proceed.<br>Their current proposal to treat the final sewage effluent at Havant Thicket has never been tried in the UK before and was never mentioned in their original planning for development at the Havant Thicket site.<br>The risk of pollution with this plan at the Havant Thicket site and potential further damage to Langstone Harbour and the Solent is unacceptable. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note your objection to the use of recycled water in Havant Thicket. We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. |

| Reference | Feedback | Southern Water Response |
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| | | With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |
| WRMP732 | I strongly object to Southern Water's latest Draft Water Resources Management Plan.<br>Having heard a talk, listened to advice from a friend in the water industry and read the Havant Matters website https://havantmatters.org/ and Southern Water's webpages, I am very concerned to find that the latest plan could go-ahead: without the majority of the public having been made aware of the need to take part in yet another consultation, without the public having been presented with all the facts by Southern Water, without the need for local planning consent and with huge environmental impact and cost to residents of the South of England<br>It was my belief and that of many others that the Havant Thicket Reservoir had received planning permission on the basis that it would be for the storage of rainfall and natural spring water sourced from chalk-fed springs around Havant and Bedhampton in the winter when water was plentiful, and would be used to maintain the water supply in times of water shortage and drought. The loss of ancient woodland, which would be destroyed during its construction would be offset by tree-planting and biodiversity gain from the new habitat, provided by this unique chalk spring-water reservoir. It was believed that any change in its use was protected by planning laws and would require further local planning consent. The original emphasis was very much on an environmentally-led project.<br>This emphasis has been changed drastically as the reservoir would now become an environmental buffer lake, necessary for the operation of the effluent recycling scheme, receiving treated effluent at a rate of some 30Ml per day (the equivalent of 12 Olympic-sized swimming pools!) every day of the year, since the plant has to work 24/7 for 365 days of the year to keep the process going, whether or not drinking water is in short supply. What an incredible waste of the chemicals and energy required to highly treat the water then pump it all the way up to the reservoir only for it to be mixed with what is essentially untreated water again. And that's before you look at the effect of this influx of treated water on the wildlife in and around the reservoir.<br>Then we have to look at the siting of the effluent recycling plant. Yes, I'm sure it is cheaper to acquire old landfill than land which could potentially be used for farming or housing but what about the danger to the environment. Langstone Harbour has already been overwhelmed by the outfall of treated and often untreated sewage from Budd's Farm. Are we now going to add to this, the chance that piling into the landfill for construction will release toxins into the nearby Hermitage stream and possibly into the chalk aquifers which drain south into the harbour? The harbour wildlife is under threat already and any human leisure activity will be even further | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br>As a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/ |

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| | restricted than it is now. I certainly don't like kayaking there any more and wouldn't dream of swimming.<br>Then, a 40 km pipeline will be needed to get the treated water to [redacted]. It will need to run over the top of Portsdown Hills (going to a height of about 130m), cut through four small streams and countless fields, hedgerows and woodlands and will do untold damage to our already fragile ecosystems in this shamefully nature-depleted country. Huge amounts of energy will be required to build the pipeline and then to keep pumping water such long distances over the hills.<br>The whole project has a huge carbon footprint and I find it very hard to see how this fits in with Scope 3 Emissions and Capital Carbon, of Southern Water's 2025 Roadmap to Net Zero https://www.southernwater.co.uk/about-us/our-plans/net-zero-plan/.<br>It will cost £1.2 billion to construct and around £3 million to operate per year, not taking into account the cost of extra pumping stations to transfer the water. Those of course are the estimated costs which, looking at every other huge infrastructure project, will likely treble by the time the project is completed. And all this is for a plant which has an operational life of just 60 years, after which it can no longer be used. My suspicion is that every Southern Water customer will be paying for this, for decades to come while Southern Water shareholders walk away with the profits from this huge infrastructure project.<br>This is all assuming that Southern Water will be able to run this plant which operates using a complex procedure and requires high levels of maintenance. The system of self-regulation and reporting currently in place, frankly, offers me no reassurance at all. What's to stop the whole reservoir becoming contaminated? Their past record does not instil confidence.<br>And of course, none of this will make our rivers and seas any cleaner but will in fact add to the load as the concentrated reject water from the process will be discharged into the Solent and reject solids will probably be added to the treatment works at Budd's Farm.<br>There are several much more sustainable environmentally friendly alternatives listed on the Havant Matters pages which make much more sense when we are in the middle of a climate crisis and should be aiming to get to net zero as soon as possible. Reducing the 100 million litres a day that Southern Water loses to leaks would be a good start! Collecting more than just 1% of free rainfall would also be good.<br>Why are Southern Water going for this huge project? Is it purely driven by profit? Are Macquarie planning to do the same to Southern Water as they did to Thames Water?<br>Please listen to all the arguments but for the sake of all Southern Water customers' pockets and our attempts to reduce our carbon footprint for our children and our children's children's future, stop this project and reject Southern Water's latest Draft Water Resources Management Plan. It is not a sustainable solution. | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>The increase in energy use is needed to power the technology that will provide water to customers and reduce abstractions thereby protecting the county's rare and sensitive chalk streams.<br><br>We have included measures to avoid or minimise carbon emissions throughout the project's lifecycle, including using resources sustainably and, where feasible, incorporating a design that is energy efficient, minimises carbon and is climate change resilient.<br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |

| Reference | Feedback | Southern Water Response |
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| | | Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>With regard to possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP734 | I would like to voice my concerns and objection to, the above, proposed scheme, particularly regarding the inadequately researched impact of financial and environmental costs to customers and local area.<br>I was very enthusiastic when the original Reservoir Plans were shared with local residents, many more reservoirs would seem an obvious solution, to collect and manage Britain's plentiful rainfall that is not currently being used effectively.<br>However, these additional plans need further debate on other, possibly better methods before final, irreversible , costly decisions are made.<br>The decisions should prioritise the prevention of the scandalous sewage releases and better avoidance methods researched and implemented. Langstone Harbour would appear to be put at even greater risk of pollution, environmentally, if Broadmarsh is selected for the effluent recycling site. It has been obvious to anyone for years that the land is unstable, by the constant changes in road surface levels. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Regarding storage, we have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice |

| Reference | Feedback | Southern Water Response |
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| | I have no confidence that the views of local people will be considered but this scheme surely should be given greater debate and alternative options offered.<br>I would like my three grandchildren to be able to enjoy safe swimming from our wonderful local beaches, once again. | measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP735 | Dear WRMP Team,<br><br>Instead of a Recycling Plant at Sandown, the Orca Iceberg De-salivation buoys in groups, could deliver 53,000 litres of fresh water a day.<br><br>They are wave powered and if stronger waves are required than are available off Sandpwn, then south of the Island should surely be possible. Not so much shipping there either. Each unit is said to produce up to 1000 litres a day.<br><br>Best wishes | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Thank you for your comments. Suggestions are gratefully received. |
| WRMP736 | I have reviewed this Plan and ask Defra to reject it principally because the WRMP does not properly consider other options to develop drought resilience including increasing the reduction in leakage, further transfers from outside the region, location of abstraction points to allow an offtake and new reservoirs. Further, water quality issues are not adequately considered, and it does not properly undertake the required statutory Habitat Regulations Assessment.<br><br>1. The failure to consider other options allows Southern Water (SW) to make the case for expensive and damaging proposals that will take time to deliver. In particular other aquifer storage schemes are not considered, it is inconceivable that abstraction will cease entirely even in winter or at times of high flows and ground water and this water availability has not been built into the proposals. Defra funded work at [redacted] has not been progressed and this option is therefore not properly considered. Cheaper and smaller schemes in the Western Area have been rejected on timescale while effluent recycling with a longer time scale is a preferred option.<br><br>2. The case to tanker in water from Norway was previously considered expensive and unsound and, having been rejected once, it should be again. Only long term solutions should be being considered.<br><br>3. No cost benefit of the options has been provided and thus there cannot be rational decision making . This also applies to carbon budgets. The costs o fthe water transfer schemes from [redacted] are extortionate.<br><br>4. The proposed recycling options have significant environmental and cost implications which are not properly explored, for example in terms of running time, water chemistry, pollution and construction impacts. | Thank you for reviewing our rdWRMP24 and providing feedback. We have provided a response to each of your points below;<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as the Hampshire Water Transfer and Water Recycling Project (HWTWRP). A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>1) There are regulatory and statutory requirements for public water supply to be more resilient to droughts and to meet additional demands associated with growth and development. The HWTWRP will address these demands by re-using water that has already been used for public supply, rather than taking more water from the environment during times of low flows. Sea tankering from Norway is no longer included in our plan. |

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| | 5. Some recycling options have timescales which appear unachievable eg Littlehampton to Pulborough by 2031.<br><br>6. The potential for nutrient and pharmaceutical loading on Havant Thicket reservoir and the accumulation in sediments with subsequent environmental issues has not been considered. Algal blooms are well known to occur in reservoirs even where wastewater recycling does not take place. Pharmaceutical loading is an increasing problem. Traces of many medicines are found in Chichester and Langstone Harbours and movement of these contaminants to the reservoir and thus to drinking water as will occur. As the use of the reservoir continues it is likely that there will be increasing concentrations of these contaminants which will also occur int he sediments. Allied to this is a complete change on the basis of which the concept of the reservoir was 'sold' to the public.<br><br>7. The HRA does not appear to have been properly undertaken.<br><br>'The HRA screening is precautionary, and to be compliant with case law, does not take into account the effects of mitigation measures. In consequence, the majority of options needed to be screened for the more detailed appropriate assessment as significant effects were considered either likely or uncertain for a range of European sites. However, once the appropriate assessment was able to take into account the nature of the options and the potential for mitigation through scheme design and delivery, the September 2023 HRA (Annex 18), plus the July 2024 HRA Addendum (Annex 18A61), concluded that for virtually all of the rdWRMP24 options, there will be no adverse effects on any European protected sites (and Ramsar sites) that cannot be reliably avoided through scheme design or mitigated with measures that are known to be available, achievable and likely to be effective at the project-level. However, it is recognised that there are some residual uncertainties associated with some options due to the absence of detailed design and the long planning horizon for delivery. In these instances, this does provide substantial time for any residual uncertainties associated with these options to be resolved and (if necessary) the option set aside and replaced in future WRMP cycles.<br><br>The HRA of the draft WRMP24 provides a strategic, plan-level assessment to support the WRMP. It is not an application-specific ("project" level) assessment. A more detailed, project-level HRA (with Stage 2 Appropriate Assessment where required) will be needed to support any actual planning application and environmental permit or consent.'<br><br>Guidance on the assessment of plans requires firstly the Stage 1 screening for likely significant effects – this requires that the plan has no likely significant effect either alone or in combination with other plans or projects. From line 3 in the extract above, it can be seen that this is not the case. Stage 2 is the Appropriate Assessment and Integrity Test. This is undertaken considering further mitigation where required. The question is, is it possible to ascertain no adverse effect on integrity? From para 1 above , it can be seen that this is not met. Individual 'projects', and this would certainly include the Water Transfer Schemes (see second paragraph above), will need to be considered carefully as they form an integral part of the Plan and failure to pass the | 2) Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>3) We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding sustainable water supplies into the future means we need to look at all viable alternatives to the sources that have been traditionally used. Water recycling creates a safe and sustainable supply of purified recycled water that goes through several stages of treatment before it is sent into supply. Water recycling is already widely used around the world – in Australia, Singapore, the USA and Belgium. Southern Water is one of several water companies in the UK developing water recycling plants to create new sources supply for the future. A detailed report will be published later in the year, with the results informing additional assessments including the Environmental Impact Assessment for HWTWRP. For more information about water recycling please visit: www.southernwater.co.uk/water-recycling<br><br>4) Some of the options in WRMP24 are carried over from previous WRMPs and their delivery timescales reflect the point at which the additional water resources are needed, in tandem with work already underway to progress the project.<br><br>5) Regarding possible algal blooms, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Regarding accumulation of substances in Havant Thicket reservoir sediments, the advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>6) The WRMP HRA recognises where uncertainty remains regarding the effects some options may have upon Habitats sites, and where further investigation is required to address these uncertainties and progress project level assessment. The WRMP HRA will be updated to expand on the investigation required to address these uncertainties and set out, in principle, the programme and sequence of activities necessary to address the HRA process. It should be noted that the Environment Agency, along with Natural England have provided detailed comments regarding the HRA for the WRMP. Work is being undertaken to address these comments and make any necessary changes to the HRA so that it incorporates and reflects regulatory comments. Please refer to SoR Annex 4 Ref for our response to these as well as for reference to changes made to the HRA. It is also worth noting that individual projects contained in the WRMP, such as HWTWRP, will be subject to additional more detailed environmental assessment as part |

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| | Habitats Regulations tests will mean that they cannot be delivered leading to failure of the Plan. On this basis, it is likely that the Appropriate Assessment moves to Stage 3, Alternative solutions which has not been undertaken.<br><br>Further no consideration has been made as to the effects of constructing a Water Recycling Plant on a former land fill site close to the Chichester and Langstone Harbour SPA with particular, but not exclusive, regard to the release of contaminants and the impact on the European site.<br><br>I urge Defra to reject this draft WRMP. | of the DCO/planning application process. Further information is available on the dedicated project page; https://www.hampshirewtwrp.co.uk/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project on designated sites is part of our ongoing project level HRA and Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP737 | Absolutely abysmal.<br><br>I've just heard this on local radio. Why has Southern Water not informed its customers by using a mail drop? They certainly have not informed me as a Portsmouth resident of it.<br><br>I have major concerns with this.<br><br>I want to understand why there are no alternatives for Southern Water...Is this the real reason? This effluent recycling scheme (the very thought of which is certainly off putting to say the least) will deliver a profit of about £45 million pounds to Southern Water. I have NEVER agreed with the privatisation of our infrastructure! This kind of profiteering paid for by customers is not acceptable. We see it with the Electricity and Gas companies, which generate huge profits for its share holders and bosses, but all at the expense of the customers.<br><br>The cost in planning this scheme ( £1.2 billion) to recycle treated waste water into Havant Thicket Reservoir, along with 3 other recycling schemes, Southern Water are taking us down a very slippery slope. Sustainable solutions first, that work with climate change to collect the estimated increase in winter rainfall and store it in new reservoirs for use in dry summers. I just cannot believe that we now only collect 1% of the rainfall in the UK. Not only that, but we have 2 weeks of sunshine and we have a ban on hosepipes and the water companies declare a drought. The collection and storing of rain water in winter is a no brainer, it would also help reduce flooding and also provide recreational facilities for our communities. Storage options need to be developed closer to where the water is needed, so that long pipelines that damage our countryside and wildlife are not required.<br><br>For years we have known about the state of our pipelines. In the city, one of our major roads into Portsmouth has been closed due to leaks, not once, but multiple times, eventually forcing the renewal of several hundred meters of pipe. The money should be spent on renewal of the existing infrastructure and preventing water wastage. 3% of water Southern Water take from the environment is lost before it even reaches the treatment works. A further 19% of water that | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each |

| Reference | Feedback | Southern Water Response |
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| | customers have paid to treat is currently lost to leakage in the distribution network as mentioned already, and that's more than 100 million litres of precious water lost every day.<br>Southern Water must be mandated to deliver a much faster programme of renewing water mains to replace their ageing pipe network, or they will never get this age old leakage issue under control. Currently they only have a replacement rate of just 1 in 1000 years, and bearing in mind a water main is only designed to last 120 years. The whole issue is just unacceptable.<br><br>And Lastly, how can we trust Southern Water with the complex technology required to treat final sewage effluent? I understand it has not been used for this purpose before in the UK? Are we a trial? Guinea Pigs, another way to reduce the population? (OK being slightly sarcastic) If they can't fix the leaks, you tell me what confidence can we expect, that contaminated water will not leak into the "water for consumption" arena? They are guilty already of massive discharges of raw sewage into the sea, which are blown back onto the beaches where people go for recreation. Southern Water have a proven poor track record of treatment plant and pumping station failures, many prosecutions for pollution incidents and failure to take prompt action to rectify problems. The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable.<br><br>As I suspect, despite the huge investment in such a hairbrained scheme (which the customers will be forced to pay for I'm sure) is it the "easy" profit what is fueling this fiasco? The fact that it takes a radio station to inform Southern Water Customers of this garbage, and NOT Southern Water themselves, stinks of pushing something through the back door "unseen" where the ONLY beneficiary is Southern Water, its shareholders and its bosses.<br><br>If despite, all of the concerns about whether effluent recycling is needed, the significant environmental impacts, and the enormous costs to build & operate are to be ignored, AND Southern Water push ahead with their leaky plan, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great to the environment. | successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br>With regard to possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP738 | As a resident of Horndean and a regular cyclist around the new Portsmouth, Havant and beyond, I am very concerned about the details behind Southern Waters Draft Water Resources Management Plan. | Thank you for reviewing our rdWRMP24 and providing feedback. |

| Reference | Feedback | Southern Water Response |
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| | The core reasoning and approach being taken by the corporations involved seem to be seriously flawed, and proposals that are not in the public interest have been put forward. Furthermore, the scheme risks severe environmental damage in the areas that the overall scheme will directly affect and create a deplorable financial impact on the public purse, much along the lines of other large projects that have recently been in the news.<br><br>My own research on the matter has identified:<br><br>1. Environmental Impact: There are significant worries about the ecological consequences of the effluent recycling scheme, particularly the highly concentrated reject water that will be discharged into the Solent, which will be four times more concentrated than the current sewage effluent.<br>2. Risk to Langstone Harbour: Developing the effluent recycling plant and deep tunnel shafts on the contaminated landfill site at Broadmarsh poses a significant risk to Langstone Harbour.<br>3. Sustainability Issues: The solution is not sustainable, especially considering it will be built over 25 miles away from where the recycled water is needed.<br>4. High Costs: The project is extremely costly, with a minimum estimated expense of £1.2 billion. Costs are expected to rise, making it difficult to justify providing 'best value' for customers.<br>5. Pollution Risks: There is a significant risk of pollution from the recycling plant, particularly if Southern Water does not maintain it properly. Additionally, there are no plans for independent monitoring of the discharge into the reservoir.<br><br>Finally, based on the conversations I have had with my local friends and neighbours, the approach taken by Southern Water to ensure that the customer and population of the affected area understand the proposal and the reasoning behind it has been, frankly, Machiavellian. Very few people are aware of the genuine proposal, its potential actual cost to the customer and the real environmental impact the scheme will have on a birth-to-death basis over a lifetime of 60 years.<br><br>I strongly urge you to stop this effluent recycling system scheme moving forward. The planning is rushed. The alternatives have not been researched effectively, and their impact on the local area will be significant. It seems that there is only one organisation that will gain from this scheme, and that is Southern Water itself, which will gain financially as they are allowed to make a profit on schemes of this type. | Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non- |

| Reference | Feedback | Southern Water Response |
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| | | targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP739 | I am writing to register my concerns regarding this plan in the hope that you totally reject it.<br>Given Southern Water's appalling track record for dumping effluent into the Solent they are obviously not fit for purpose managing or fulfilling their current remit!<br>The notion that they could implement & properly manage such a greedy money spinning scheme without harm to the public & the environment is preposterous.<br>They don't even have the capacity to deal with telephone enquiries efficiently & effectively, this I know from personal experience.<br>The notion of drinking water that has been 'processed from effluent' by a manmade system is totally unacceptable when 'Greener' natural processing is available .<br>Natural systems for purifying water have evolved over millennia so we don't need potentially unsafe water piped through toxic landfill, causing further risk of contamination.<br>As Southern Water's ineptitude prevents them from maintaining the current system adequately ,heaven knows how they could possibly manage such a scheme, especially given their track record for prioritising profits over a safe environment.<br>In my own garden I collect & use as much rainwater for watering plants & keeping my ponds topped up & healthy ( as do many other individual households ) as possible.<br>It's pity that Southern Water is incapable of applying similar resourcefulness on a grand scale due to its inability to properly maintain the current infrastructure.<br>This whole project appears to be yet another example of prioritising revenue over safety , the environment & public service ,especially when water is such a precious resource that is 'God given ' & not a StockMarket commodity .<br>I am also deeply offended that ,until the Green Party informed me of these potentially life influencing proposals , I was totally oblivious to them. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

| Reference | Feedback | Southern Water Response |
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| | I sincerely hope that you take my , & similar , opinions into account before you take any drastic decisions to approve this very risky proposal! | In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding the potential to develop sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>Regarding storage, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP740 | I strongly object to southern waters proposals on 5 accounts 1-the cost 2-The environmental impact on all the proposed work areas 3-The change from the original plan of filling the reservoir with pumped spring water 4-The actual ability of southern water to complete a project on time and within budget 5-The cost and inconvenience that will occur should all the proposed works go ahead | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. |
| WRMP741 | Please can you see sense and rethink the ability of Southern Water to manage the South's water supply. It looks as if the Accountants are overruling engineering sense for short term gain and inviting very large financial and environmental costs in the future. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | The UK government need to alter the pricing mechanism that Southern Water exploit in spending unnecessarily on new infrastructure such as pipes and equipment for recycling waste water to drinking water and infrastructure to import potential fresh water from Norway. What needs new infrastructure is waste water treatment, and stop pumping raw sewage into our rivers and sea.<br>Southern water need to maintain its existing pipelines to increase the amount of natural water it uses and remove excess fresh water, reducing flood risk to houses built in flood plains. Why pay for a natural resource via recycling when there is plenty of fresh water available??<br>Southern Water produce volumes of information which the public have little time to piece together They do not publish detailed analysis on the evaluation of the options. Public consultations are maxed out so not everyone can attend a meeting face to face.<br>If DEFRA or OFWAT havent got the expertise, then an independent consultancy and/or academic panel together with informed bill payers should provide an evaluation of the options.<br>I am an engineer advising on supply of water as a natural resource and processing of watse water should be a simple problem to solve.<br>It seems that DEFRA is the only organization that can make Southern Water rethink its plan.<br>Below are some boiler plate facts that provide a bit more detail<br>Major concern 1 – Southern Water's plan is taking us down the wrong path<br>Point 1 - The path that Southern Water are taking is flawed<br>In planning a £1.2 billion scheme to recycle treated waste water into Havant Thicket Reservoir, along with 3 other recycling schemes, Southern Water are taking us down the wrong path. We need a plan that focuses on developing more sustainable solutions first, that work with climate change to collect the forecast increase in winter rainfall and store it in new reservoirs and confined aquifers for use in dry summers. We get plenty of free rain but only collect 1% of rainfall in the UK. Collecting and storing more water in winter would also provide multiple benefits to society, helping to reduce the forecast increase in flooding, provide recreational sites for our communities, and provide biodiversity opportunities if we build more reservoirs.<br>Major concern 2 – Southern Water need to be far more ambitious on leakage reduction<br>Southern Water need to have a much more ambitious programme of action to reduce leakage, 3% of water Southern Water take from the environment is lost before it even reaches the treatment works, then a further 19% of water that customers have paid to treat is currently lost to leakage in the distribution network, that's more than 100 million litres of precious water lost every day. Southern Water must be required to deliver a much faster programme of renewing water mains to replace their ageing pipe network, or they will never get leakage under control. Having a replacement rate of just 1 in 1000 years when a water main is only designed to last 120 years is just unacceptable.<br>Major concern 3 – As Southern Water cannot be trusted to operate & maintain its current traditional infrastructure without causing pollution, what hope is there of it safely operating the complex advanced effluent recycling treatment technology without incident?<br>How can we trust Southern Water with the complex technology required to treat final sewage effluent, which has not been used for this purpose before in the UK?<br>Southern Water have a very poor track record of treatment plant and pumping station failures, many prosecutions for pollution incidents and failure to take prompt action to rectify problems. | With regard to funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. Sea tankering from Norway is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Water recycling is widely used around the world to create a new source of |

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| | The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable.<br>Major concern 4 – Southern Water need to do more to protect the environment, and develop a strategy that helps them honour their commitment to be carbon neutral by 2030.<br>Our river catchments could be protected much more quickly if they moved river abstractions closer to the tidal limit, and abstraction boreholes down the catchment, reducing the priority for abstraction reform which is driving the need for effluent recycling.<br>Storage options need to be developed closer to where the water is needed, so that long pipelines that damage our countryside and wildlife are not required.<br>Options need to be developed that do not have such a high carbon and emissions footprint. We need a strategy that prioritises low energy solutions, the energy alone for the Hampshire scheme will cost more than £3 million/year. With pumping and treatment needed 365 days a year, even though effluent recycling was selected as a drought resource.<br>In a time of climate emergency how can Southern Water select the schemes with the highest carbon footprint and emissions? For example:<br><br>– The Hampshire and Littlehampton effluent recycling schemes have the highest negative environmental impact score of any of the options considered.<br><br>– The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by sea tankers.<br>Major concern 5 – The risks from developing the effluent recycling plant on a landfill are unacceptably high<br>If despite all of the concerns about whether effluent recycling is needed, the significant environmental impacts, and the enormous costs to build & operate are to be ignored, Southern Water are to go ahead with their leaky plan, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br>We also need to press Defra to change the water industry funding mechanism to stop incentivising infrastructure heavy solutions, but instead encourage development of sustainable solutions that work with climate change.<br>There has been inadequate publicity and consultation about Southern Water's plan.<br>– Did you find out from Southern Water about the consultation?<br>– Do you think they should have written to all Southern Water & Portsmouth Customers across the region that will be impacted by this major change to their water supply?<br>Research shows that customers prefer more natural & sustainable solutions such as reservoirs and aquifer storage, but Southern Water have not listened<br>If you don't support the Southern Water plan, then tell Defra to reject the plan and require Southern Water to develop a more sustainable plan that works with climate change & which puts the environment before profit.<br>The Hampshire effluent recycling scheme alone will deliver a profit of about £45 million pounds to Southern Water, this kind of profiteering paid for by customers is not acceptable. | supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | The huge cost of servicing the massive debt created by the selection of such expensive options will also have to be paid for by customers.<br>We recognise that the level of detail contained within the 32 volumes of publicly available information provided by Southern Water is hard to digest without the significant investment in time which many readers are unable to spare.<br><br>The action by Southern Water in unnecessarily withholding 12 volumes from public view does not help, as that is where the useful detail on options appraisal and environmental assessments is to be found.<br><br>We hope that the summary lists of concerns we have provided will help you to digest what is being proposed and to consider whether there are better options for a more sustainable way forward. | Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. |

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| | | In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We have received 1176 responses as part of rdWRMP24 consultation. |

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| WRMP742 | Southern water's record for clean water is atrocious.<br>Whatis worse is the lack of investment while still doling out bonuses while our beautiful waterways, rivers and sea are polluted due to their incompetence .<br>An incompetent group of people WHO MUST be held to account..for ys and for future generations | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>As a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/<br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP743 | I am contacting you regarding the proposals outlined for the HAvant Thicket Reservoir and Buds Farm effluent recycling site.<br>I believe the WRMP will cause environmental damage and cost an unacceptable amount, burdening the consumer with a massive debt now and for the future. The original proposals for Havant Thicket had many environmental advantages, but they have been lost with the [redacted] recycling proposal. I have listed some of my issues below, and local campaign groups have well researched arguments as to why DEFRA should reject these proposals.<br><br>Further, Havant Borough Council do not support these plans, Southern Water have not been transparent in presenting the plans.<br><br>I support the proposals of HBC in asking that DEFRA<br><br>1. Scrutinise the population figures that are used for the business case<br>2. Demand the leak fixing programme is accelerated and 80% are fixed by 2050.<br>3. Add moving the abstractions on rivers to the tidal limits as an option so it can be assessed by the Environmental Agency now.<br>4. Add the confined aquifers and reservoirs to this plan.<br>5. Retain the threat of Hosepipe bans as a mechanism to educate and nudge consumers into reducing their water use.<br>6. Use tiered, monthly water billing so the lowest consumers are rewarded and the most wasteful consumers pay for all consumers who use less than 100l/day.<br><br>Some of my issues with the WRMP<br><br>• Potential Environmental damage to Chalk Streams. Chalk streams are an endangered habitat and are already being damaged, so this further damage must be avoided and mixing large quantities of treated water into the water can damage a fragile ecosystem<br>• Using a water recycling plant is not the best or most cost effective way to address the issues of lack of water. Fixing infrastructure and collecting rainwater would be more environmentally friendly and more cost effective.<br>• It will require long pipe runs and cause damage to build<br>• Southern water need to clean up their act and fix the existing infrastructure rather than spend over a billion pounds (a sum that no doubt will rise in the future) on a system thats not been used in the UK and is very costly to operate<br>• There are enormous pollution risks involved in building/tunneling on landfill, and these risks could result in terrible damage to Langstone Harbour and the chalk streams<br>• Southern Water do not appear to be listening to the concerns and objections of locals, and are not being open and transparent. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | • As a customer I am fed up of the water companies sadeling us with debt and increasing prices to pay them off and not carrying out their responsibilities. This scheme looks designed to increase profits, rather than address the past failings<br>• The waste water reprocessing consumes a lot of energy, increasing carbon cost and alternative methods shoud be looked at<br>• the idea of tankering water from Norway in case of drought is not a realistic solution<br>• transferring water from Havant Thicket to [redacted] is not an environmentally sound way to address the issues<br>• more sustainable options have been suggested by campaign groups that can address the issues now and for the future, and these options need to be considered fully<br>I urge you to prevent Southern Water from proceeding with their proposed WRMP and consider a less costly, more environmentally friendly approach that works with the climate we have and includes fixing the leaky infrastructure that exists (with 19% of water being lost). Please compel SW to rethink their plans | A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We will continue to rely on Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs) as means to reduce demand during droughts.<br><br>We plan to conduct tariff trials once our smart metering plan is implemented and we have a better understanding of the way demand varies daily and seasonally along with key household attributes (property type, household composition, socio-demographic variables etc). This will help us select a representative sample as well as an appropriate tariff model (rising block, reducing block, seasonal) to test.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of |

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| | | our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. |
| WRMP744 | This provides my comments on the Southern Water revised draft Water Resources management Plan and specifically the proposal to recycle effluent from the [redacted] Wastewater Treatment Works.<br><br>Reading through the revised draft, and the original draft, I am surprised at how little discussion and/or evidence there is to support the Southern Water proposal to recycle sewage effluent into potable water by reverse osmosis. I am aware that reverse osmosis is commonly used to recycle industrial waste water into industrial process water, to reduce the level of total organic carbon in potable water to provide purified water for industrial manufacturing and to process non mains water supplies for private dwellings but it is very hard to find much in the way of examples where reverse osmosis has been used to recycle sewage effluent into potable water.<br><br>In these circumstances I would expect to find detailed reports describing how Southern Water validate the proposed recycling process covering at minimum an international review of use of the technology in other areas of the world, detailed discussions of the pros/cons of the technology when applied to this particular application (i.e not discussions of use in industrial processes with no critical health application) and how Southern Water intends to address these, details of the proposed design of the plant and, most importantly, detailed reports of experimental work done - using [redacted] effluent - to arrive at a plant design, to clearly show what quality of water will be delivered, together with full details of all pilot plant and scale up work to support process selection and design. I would also expect to see discussions of what quality control measures will be in place and, given that process failures could have critical health implications, a full analysis of risk and proposed mitigation.<br><br>If Southern Water was a company with an exemplary reputation in terms of environmental protection and investment in improving waste water treatment it could be appropriate to assume that these concerns will be addressed at some later point. However the Southern Water record is hardly exemplary and they should not be granted permission to proceed with such a safety critical proposal. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. |
| WRMP745 | I am writing to express my deep concern and reservation regarding the plans Southern Water has proposed to develop a waste recycling centre in Langstone. In short my three main concerns are cost, lack of public engagement and safety.<br>Cost Concerns | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. |

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| | Costs for this scheme are escalating quickly. In June 2023, the estimated cost was between £550 million and £900 million. By June 2024, this had increased to a minimum of £1.2 billion, with the potential to rise to £1.4 billion if Southern Water has to build its own pipeline to the Havant Thicket Reservoir. These rapid cost increases are a concern, especially since the technology for effluent recycling has never been used in the UK before, and its long-term costs are uncertain.<br>For the same £1.2 billion, three new reservoirs the size of Havant Thicket could be built. The current estimated cost for constructing the Havant Thicket Reservoir alone is £350 million. It's crucial to recognize that investments in effluent recycling lose value over time. The mechanical and electrical infrastructure would need to be upgraded or replaced every 10 to 20 years, with the entire system likely nearing the end of its useful life in 60 years. In contrast, sustainable reservoir solutions designed to capture increased winter rainfall will continue to provide benefits for up to 200 years, offering far better long-term value, environmental benefits, and the potential to help mitigate winter flooding.<br>The annual energy cost for treating final effluent from [redacted] Sewage Works to drinking water standards is conservatively estimated at £2.6 million. This estimate is based on energy consumption and cost data for Southern Water's Havant & [redacted] treatment plants. Additional costs will arise from treatment chemicals, staff, maintenance, and the frequent replacement of Reverse Osmosis membranes every 5 to 7 years. Furthermore, these energy costs do not include the significant pumping expenses required to transport the treated effluent from [redacted] to the Broadmarsh Water Recycling Plant, from there to the reservoir, and then over 40 km to the [redacted] water treatment works.<br>When all these additional energy costs are factored in, the total expenditure could easily exceed £3 million in a normal year (without a drought). This makes it difficult to see how effluent recycling can be considered the 'best value' solution for either customers or the environment, given the substantial annual carbon impact.<br>The additional cost to Southern Water customers is estimated at around £2.50 per month over 20 years, equating to £30 per year per household just for the Havant effluent recycling scheme. This will be followed by further price increases to cover the costs of tackling sewage discharges, fixing supply leaks, and replacing the outdated Victorian sewage infrastructure.<br>Moreover, the value of investments in effluent recycling diminishes quickly, as the electrical and mechanical systems require frequent upgrades and replacements every 10 to 20 years, with the infrastructure likely obsolete within 60 years. On the other hand, a winter water storage solution, such as a reservoir, is a long-term, sustainable option that would continue to provide value for up to 200 years, offering better returns on investment and additional environmental benefits, including the potential to reduce winter flooding risks.<br>Pursuing effluent recycling represents a short-sighted approach to water resource management. Customers will continue to pay for these costly recycling schemes long after they become obsolete, as the Ofwat funding mechanism ensures repayment. Given the limited lifespan of these plants, and the enormous upfront cost—at least £1.2 billion for the Hampshire effluent recycling and transfer scheme—it is hard to justify such an expensive solution that leaves no lasting legacy for the future. Customers will be burdened with this enormous debt well into the future, making it an unsustainable and impractical choice.<br>Lack of public engagement and the engagement there has been has not been positive | The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We are planning to build new reservoirs where feasible.<br><br>With regard to the suggestion that three reservoirs could be built for the cost of the WRP at Site 72, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We have dedicated budget for both proactive and reactive |

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| | The current approach is not supported by customers. In fact, 48% of respondents to the 2022 Consultation opposed effluent recycling, yet Southern Water has proceeded with the project despite this clear feedback. Customer research conducted by both the company and Water Resources South East consistently shows a preference for more natural solutions, such as catchment management, aquifer storage, and winter storage reservoirs. For instance, Southern Water has identified the River Adur off-line reservoir as a potential scheme for 2045, but there are likely other viable options, such as the River Wallington and River Hamble, that have not been considered. In fact, for the same cost as the proposed effluent recycling scheme, it would be possible to build three winter storage reservoirs, offering a more sustainable and customer-approved alternative.<br>When Southern Water shifted their plan from desalination to effluent recycling, they failed to conduct a thorough review of all alternative options, nor did they carry out a full statutory consultation as required. Despite this, they have proceeded with their plan without fully engaging customers or exploring other potential solutions.<br>In previous consultations, posters were not displayed at locations where the infrastructure will be sited, limiting public awareness. Furthermore, there has been no direct mailing of customers or information included with their water bills to ensure they are informed. Southern Water has confirmed that they have no plans to notify all customers about their plans or upcoming consultations. This is concerning, especially when case studies from drought-stricken countries highlight the importance of customer engagement in securing public support for large-scale water projects.<br>Instead of pumping treated effluent more than 40 km to a distant reservoir, why not explore the possibility of recycling sewage closer to areas where the water is actually needed, such as near Southampton? This would not only reduce the environmental impact of long-distance pumping but could also offer a more efficient and environmentally friendly solution—if effluent recycling is to be pursued at all.<br>Moreover, the significant investment in effluent recycling becomes redundant once the plant reaches the end of its life in approximately 60 years. The electrical and mechanical infrastructure will require upgrades or replacement every 10 to 20 years. By contrast, a winter water storage solution, like a reservoir, works with the natural cycles of climate change and will still be operational for up to 200 years, offering better long-term value for money. It also provides greater environmental benefits, such as helping to mitigate winter flooding risks, while ensuring a more sustainable and lasting solution for the future.<br>Safety Concerns<br>Southern Water loses a staggering 100 million litres of water every day to leaks, which represents 19% of all the water they abstract from the environment—water that customers are paying to treat, but is wasted due to leakage in their distribution system. Despite this, their current programme for addressing leaks is painfully slow. As a result, even by 2050, Southern Water is projected to still be losing around 10% of all the water they treat, including the new water generated at great cost through their planned effluent recycling schemes. Without a much more ambitious programme to replace ageing water mains, Southern Water will never get a handle on leakage and will continue to waste precious resources at an unacceptable scale.<br>Would you trust this company to process recycled water to provide fresh drinking water when it can't even manage to handle waste water cleaning appropriately? | maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) on in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>With regard to possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |

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| | | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP746 | I am writing to say how appalled I am that Southern Water's plan to recycle effluent is being considered.<br><br>In this area our water supply is from chalk aquifers and it seems unnecedessary to pollute this with recycled effluent. I accept that our chalk streams are under threat by over abstraction and there may be a shortage for some areas.<br><br>However, I don't believe that the recycling of sewage effluent is the answer.<br><br>More needs to be done to reduce leaks so that the huge amount of treated water is not lost in the distribution system.<br><br>This country has plenty of rain and we should be building reservoirs to collect and store this precious resource. Not only could this result in less flooding but reservoirs provide a great resource for nature and also areas for recreation. Reservoirs last much longer than S Water's planned scheme and would be much cheaper overall.<br><br>S Water's scheme has a high environmental impact , high carbon footprint and high emissions which is not what this country should be embarking on in view of the climate crisis that we are all threatened by.<br><br>It is madness to be transporting the treated effluent miles across the region with the incredible costs in money and energy plus the damage to the environment to get it from Havant to the areas that require the water. If this awful idea has to go ahead then the treatment and storage should be closer to the areas of need.<br><br>Again it is madness to be considering siting the recycling plant on an old landfill site. Digging into it with all the tunnels for pipework etc will risk who knows what contamination entering both Langstone and Chichester Harbours, the land around and the water supply. There is a high risk of "Forever Chemicals" being released with unacceptable consequences.<br><br>Southern Water and Portsmouth Water have not publicised this proposal, details should have been sent to all customers so that we can have a say in it. If it wasn't for the Residents Association and Hayling Sewage Watch I wouldn't know about it and have a chance to express my opinions. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. |

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| | I am aware that others I have spoken to knew nothing about it. How can that be a reasonable "Consultation"?<br><br>I can only hope that common sense will prevail and this scheme will be rejected. | We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>With regard to siting, multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |

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| | | Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/ |
| WRMP747 | I am writing to say how appalled I am that Southern Water's plan to recycle effluent is being considered.<br><br>In this area our water supply is from chalk aquifers and it seems unnecessary to pollute this with recycled effluent. I accept that our chalk streams are under threat by over abstraction and there may be a shortage for some areas.<br><br>However, I don't believe that the recycling of sewage effluent is the answer.<br><br>More needs to be done to reduce leaks so that the huge amount of treated water is not lost in the distribution system.<br><br>This country has plenty of rain and we should be building reservoirs to collect and store this precious resource. Not only could this result in less flooding but reservoirs provide a great resource for nature and also areas for recreation. Reservoirs last much longer than S Water's planned scheme and would be much cheaper overall.<br><br>S Water's scheme has a high environmental impact , high carbon footprint and high emissions which is not what this country should be embarking on in view of the climate crisis that we are all threatened by.<br><br>It is madness to be transporting the treated effluent miles across the region with the incredible costs in money and energy plus the damage to the environment to get it from Havant to the areas that require the water. If this awful idea has to go ahead then the treatment and storage should be closer to the areas of need. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. |

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| | Again it is madness to be considering siting the recycling plant on an old landfill site. Digging into it with all the tunnels for pipework etc will risk who knows what contamination entering both Langstone and Chichester Harbours, the land around and the water supply. There is a high risk of "Forever Chemicals" being released with unacceptable consequences.<br><br>Southern Water and Portsmouth Water have not publicised this proposal, details should have been sent to all customers so that we can have a say in it. If it wasn't for the Residents Association and Hayling Sewage Watch I wouldn't know about it and have a chance to express my opinions.<br>I am aware that others I have spoken to knew nothing about it. How can that be a reasonable "Consultation"?<br><br>I can only hope that common sense will prevail and this scheme will be rejected. | As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |

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| WRMP748 | Southern Water – Havant Thicket Reservoir<br><br>If I recall correctly the planning permission for the Havant Thicket reservoir, was for the collection of rain water and that excess water would be abstracted from local streams and redirected to the reservoir.<br><br>Recycled water / leak prevention<br>I have concerns about the proposal to use recycled water to top up the supply.<br>Surely, with the amount of rainfall there are creative ways to collect and use it.<br>If the figures regarding wastage from leaks are accurate, an ambitious planned investment in the pipe infrastructure to renew the system would be cost effective.<br>Perhaps Building regulations should be reviewed so water from roofs is collected separately from domestic/commercial waste water.<br><br>Pollution<br>With regard to siting the treatment plant at [redacted] and utilising the area formerly a tip raises huge concern. That land is far from stable and construction would inevitably disturb chemicals and other matter that is best left alone. Langstone harbour already suffers from pollution from 'legal' sewage discharges. The aim must be to reduce the pollution, not potentially increase the likelihood of contamination.<br><br>Energy / environmental efficiency<br>This proposed scheme, pumping waste water across Hampshire to [redacted], cannot be energy efficient, assuming it has to run continuously. Local lower cost solutions would be preferable, especially when there are ways to transfer water within the Hampshire Grid system. Is this a case of attracting funding to large capital projects, when smaller environmentally sensitive schemes would not be funded?<br><br>Yours faithfully, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction |

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| | | limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. |
| WRMP749 | I am writing to set out my objections to Southern Water's draft Water Resources Proposals and in particular the proposed production of drinking water by treating effluent and especially the scheme to do so with a plant at Havant Thicket Reservoir.<br>A very significant alteration is being proposed to customers' water supply with the source changing from river, spring or groundwater to recycled effluent.<br><br>1. Economic Considerations: The cost of implementing and maintaining the effluent recycling scheme is substantial. It is essential to consider whether the financial resources could be better allocated to more sustainable and publicly acceptable solutions.<br><br>a. The estimated cost for the effluent recycling scheme at Havant Thicket Reservoir is now £1.2 billion to £1.4 billion. Costs for this scheme are rising rapidly. The estimated cost in June 2023 was £550-900 million. My concern is that the costs will continue to spiral, one reason being the technology used for effluent recycling has not previously been used in the UK.<br><br>b. If the current costs of the effluent recycling scheme at Havant Thicket Reservoir had been known in 2021/22, would the scheme have been selected as best value? Considering the current minimum £1.2 billion cost, regulators need to examine the proposed costs carefully.<br><br>c. It would be considerably cheaper to build new reservoirs to collect and store rainwater. The option of doing so has not been explored sufficiently. Reservoirs are semi-permanent assets whereas the effluent recycling plant will have a relatively short life in comparison and is much less environmentally sustainable. It is estimated the Havant Thicket Reservoir will cost £350 million to construct. At this level, three such reservoirs could be built for the same cost as the £1.2 billion effluent recycling plant.<br><br>d. Similarly, opportunities to use aquifers to store excess winter rainfall have not been sufficiently considered. The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. It is essential the investigation of such schemes be prioritised and funded urgently so that these schemes can be included as feasible options. Around the world, aquifer storage has been successfully used for many years, including in California and in the UK, in the Thames Basin. Tests in Dorset have previously shown that aquifer storage and recovery is feasible in confined sections of the chalk.<br><br>e. Bizarrely, the Hampshire effluent recycling/ transfer scheme is almost as expensive to operate per megalitre as shipping water in from Norway by tanker. This cost is confirmed in the 'restricted documents'. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10-20 years of the electrical and mechanical plant.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded |

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| | f. The long-term viability of the effluent recycling scheme is questionable. It is crucial to ensure that any measures taken are not only effective in the short term but also sustainable and beneficial in the long run.<br><br>2. Public Acceptance of Drinking Recycled Wastewater<br>The public perception and acceptance of drinking recycled wastewater is a major hurdle and faces significant public resistance. Despite advanced treatment processes, many people may find the idea unpalatable, leading to a lack of trust in the safety and quality of the water. This could result in decreased water consumption and increased reliance on bottled water, which would counteract the environmental benefits of the proposal. This could result in more environmentally damaging plastic pollution, creating a plastic bottle mountain, especially as mixed reservoir water will taste different to spring water.<br><br>3. Health and Safety Risks:<br>Although modern treatment technologies are highly effective, they are not infallible. The presence of emerging contaminants, such as pharmaceuticals and personal care products, poses a risk that current treatment methods may not fully mitigate. Ensuring the long-term safety of recycled water requires continuous monitoring and advancements in treatment technology, which could be costly and resource-intensive.<br><br>4. Environmental Impact: The environmental impact of the treatment process itself is a concern:<br>a. Energy security is already a significant concern. Developing energy intensive solutions to water procurement makes things worse for energy security and the planet.<br><br>b. Advanced treatment processes require significant energy and chemical inputs, which could offset the environmental benefits of recycling wastewater.<br><br>c. The overall carbon footprint and sustainability of the proposed system needs more thorough evaluation.<br><br>d. Developing the effluent recycling plant and the deep tunnel shafts that are needed on the contaminated landfill site at Broadmarsh poses a significant environmental risk to Langstone Harbour.<br><br>e. In view of Southern Water's poor track record of treatment plant and pumping station failures, number of prosecutions for pollution incidents and its failure to take prompt action to rectify such problems, Southern Water cannot be trusted to operate and maintain this complex advanced treatment process<br><br>Planning Process: These effluent recycling plants should not be regarded as 'Nationally Significant Infrastructure Projects' and thereby bypass Local Planning Authority processes, particularly the [redacted] plant in Havant. [redacted] is a local matter, not a national issue. | concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk |

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| | The previous Southern Water draft Water Resource Management Plan in 2023 was rejected following public objections and concerns expressed by regulators. It is very disappointing that Southern Water has not taken the opportunity to start again, undertake a more realistic review of the forecast water resources position and a more robust evaluation of potential solutions to bring forward a more sustainable plan.<br>Southern Water have put all of its 'eggs in one basket'. It would be better, more resilient and more sustainable to develop multiple smaller schemes, close to where water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>Please reject the current draft plan and require Southern Water to develop a plan that puts the environment before profit. | consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP750 | I'm against the use of recycled wastewater by Southern water | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket has been noted. |
| WRMP751 | I think that these plans for effluent recycling are going in the wrong direction.<br>Climate change is an evident threat, and so we need to look for solutions that are sustainable in terms of energy use. The proposed solutions require huge amounts of energy and will produce much more carbon emissions than other ways of conserving water.<br><br>We need to focus on stopping the 19% of water that is lost to leaks after treatment, and the extra 3% that is lost earlier. Southern water needs a much faster programme of renewing water mains and pipes. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. Climate change and environmental sustainability are key factors considered during this process. This will continue to be the case for WRMP29. The scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. |

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| | Another focus should be the collection and storage of rainwater in winter. Nowadays , only 1% is collected. New reservoirs and storage facilities need to be built, which could also reduce the risk of flooding , increase opportunities for biodiversity, and provide places for recreation.<br>Southern Water does not have a good track record in regard to pollution caused by failures in its pumping stations, and lack of action to rectify faults. If they can't get the present problems under control, how can they be trusted to be able to prevent any pollution of the Havant Thicket reservoir, Langston harbour and the whole of the Solent.<br>There are many things that S Water could do to protect the environment. They could move river and borehole abstractions closer to the tidal limit, which would protect river catchments. They could develop storage options nearer to where the water is needed, avoiding long and damaging pipelines. One wonders why S W are choosing schemes that cost such a lot in energy, eg £3 million a year for the Hampshire recycling scheme.<br><br>It would be cheaper in carbon impact terms, to transport water by tanker from Norway.<br><br>The whole scheme seems to be designed to make profits for SW through infrastructure. Instead , they need to look for sustainable solutions that work with climate change, instead of against it. If the water industry funding mechanism incentivises large infrastructure projects, then it needs to change to encourage solutions such as aquifer storage and reservoirs. Public opinion is in favour of these types of solutions and against large disruptive pipelines, huge recycling plants that risk leaching effluent to Langstone harbour.<br><br>I urge DEFRA to reject totally these plans and to insist that all the solutions of water storage, and conservation are used first. | Water recycling and desalination invariably uses more energy than conventional supply sources such as groundwater or rivers, due to the advanced treatment techniques used. However, these conventional sources are no longer available to us as they once were.<br><br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>As to your point on reservoir storage, they require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding aquifer storage, a Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: |

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| | | https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The wastewater recycling plant will monitor the quality of treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of treatable parameters. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Ofwat regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results, and it cannot be demonstrated that the preferred plan is either least cost or best value. |
| WRMP752 | I'm very concerned about Southern Water's plans for effluent recycling. Their plans are heavy in energy use, wasteful in terms of resources, very damaging to the environment in the construction of very long pipelines , and carrying the extensive risk of pollution from the effluent, its processing and the residual product.<br>In a period when climate change is an evident threat, we need to look for solutions that are sustainable in terms of energy use. The proposed solutions require huge amounts of energy and will produce much more carbon emissions than other ways of conserving water.<br><br>We need to focus on stopping the 19% of water that is lost to leaks after treatment, and the extra 3% that is lost earlier. Southern water needs a much faster programme of renewing water mains and pipes.<br><br>Another focus should be the collection and storage of rainwater in winter. Nowadays , only 1% is collected. New reservoirs and storage facilities need to be built, which could also reduce the risk of flooding , increase opportunities for biodiversity, and provide places for recreation.<br>Southern Water does not have a good track record in regard to pollution caused by failures in its pumping stations, and lack of action to rectify faults. If they can't get the present problems under control, how can they be trusted to be able to prevent any pollution of the Havant Thicket reservoir, Langstone harbour and the whole of the Solent. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | There are many things that S Water could do to protect the environment. They could move river and borehole abstractions closer to the tidal limit, which would protect river catchments. They could develop storage options nearer to where the water is needed, avoiding long and damaging pipelines. One wonders why S W are choosing schemes that cost such a lot in energy, eg £3 million a year for the Hampshire recycling scheme.<br><br>It would be cheaper in carbon impact terms, to transport water by tanker from Norway.<br><br>The whole scheme seems to be designed to make profits for SW through infrastructure. Instead , they need to look for sustainable solutions that work with climate change, instead of against it. If the water industry funding mechanism incentivises large infrastructure projects, then it needs to change to encourage solutions such as aquifer storage and reservoirs. Public opinion is in favour of these types of solutions and against large disruptive pipelines, huge recycling plants that risk leaching effluent to Langstone harbour.<br><br>I urge DEFRA to reject totally these plans and to insist that all the solutions of water storage, and conservation are used first.<br><br>I've seen very little publicity about these damaging plans. Surely such major infrastructure projects should be much better publicised. People need to know what their water companies have in mind , especially those with such poor environmental records as Southern Water. | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. However, we know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted |

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| | | that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP753 | Southern Water revised draft Water Resources Management Plan<br><br>There is no justification in destroying acres of Oxfordshire farmland and flood plain, increasing risk of flooding to homes and lives to increase the size of sesro to provide the Southern to Thames transfer!<br><br>I am strongly against the Thames to Southern Transfer in this plan:<br>A. The lack of wisdom of transferring water out of a water stretched Thames Valley area B. Exorbitant cost to customer for minimal benefit. (capital cost £1.6billion)<br>Further, the cost of sesro is grossly underestimated (see Prof Binnie, former government UK reservoir advisor warnings that sesro costs will soar by as much as 100%). Where is an accurate and transparent cost benefit analysis?<br>C Environmental destruction in Oxfordshire for minimal benefit in Hampshire streams.<br>Firstly, Thames Water have failed to show the cost to the environment in Oxfordshire. For example, they list one ancient tree when campaigners have had over 200 ancient and veteran irreplaceable trees verified with the Woodland Trust. The cost to the environment in Oxfordshire has been grossly undervalued. Increasing the size of sesro from 100mm3 to 150mm3 to accommodate the t2st increases the damage for minimal benefit in Hampshire. Secondly, Southern Water have been shown to say the risks of having occasional drought orders instead are minimal. Don't destroy acres of oxford countryside for negligible benefit elsewhere.<br>The water companies are profiteering at the expense of Oxfordshire countryside and residents. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>As part of public consultation on SESRO in summer 2024, a number of documents were issued and clearly mentioned the planned capacity for the reservoir (150 million cubic meters). The documents are available on the Thames Water website. See, for example, https://dn9cxogfaqr3n.cloudfront.net/2024/13491+-+TW+SESRO+Summary+brochure_A4_WEB.pdf and https://dn9cxogfaqr3n.cloudfront.net/2024/Option+Appraisal+Context+and+Methodology+Report.pdf<br><br>The Environment Agency's (EA) National Framework (Meeting our Future Water Needs:<br><br>A National Framework for Water Resources) explores England's strategic long-term water needs across all key sectors up to and beyond 2050, emphasising that if action is not taken many areas of England will face water shortages.<br><br>T2ST is considered to be in accordance with the National Framework and Regional Plan requirements, in that T2ST forms part of a portfolio of supply side strategic options identified as being required in the WRSE draft Regional Plan. The National Framework supports this approach, recognising that substantial new supply infrastructure will be required. |

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| | D. Increasing sesro size to accommodate this also grossly increases the flood risk and safety risks to local residents. Without a consultation on the increased size, without a Dam break analysis, these risks have not been taken into consideration at all which is astounding! The risk of dam failure is low but the consequences are deadly! Increasing the sesro size multiplies this risk massively for my home, my family. My family home I, and those in it, would now be unlikely to survive a catastrophic failure. Low risk of it happening maybe but too poorly justified to be acceptable. Where is the comparison to the use of desalination, drought orders, Severn Transfer? | At this stage, the environmental assessments for T2ST are high level, considering all the various options. At the point when the project progresses to the stage where planning consents are required, the chosen option will need to be fully appraised, and in most cases an environmental statement will be produced. Where required that statement sets out the likely environmental impacts and what mitigation is required.<br><br>Community and stakeholder engagement is crucial to the development of the Strategic Resource Options (SROs), including T2ST. Before applying for permission, both ourselves and Thames Water will need to demonstrate that we have presented information about the proposals to the community, gathered feedback and considered the views of stakeholders.<br><br>Since the SROs are at a very early stage of development, consideration should be given to that when reviewing the proposals. They are for the purposes of allocating further funding not seeking permission at this stage.<br><br>The Natural Capital Assessment (NCA) for the T2ST project identified that the preferred options will likely cause the temporary and permanent loss of natural capital stocks during construction. Stocks that are likely to be permanently lost include arable land, pasture, other semi-natural grassland and active floodplain. However, best practice mitigation (such as pipejack or micro tunnel crossings) and reinstatement/ compensation of habitat means that most natural capital stocks post-construction will have no to little change.<br><br>The NCA has identified that pipeline routes through the route corridors exist that avoid the majority of impacts on ancient woodland. These findings are expected to inform future design development.<br><br>Further information including the environmental assessments for T2ST can be found here<br><br>https://www.thameswater.co.uk/about-us/regulation/strategic-water-resource-solutions/water-transfer-from-thames-water-to-southern-water |
| WRMP754 | Having been alerted to Southern Water's plan by the Green Party as there were no public consultation announcements, we are writing to register our concerns as local residents at the proposals to reprocess recycled sewage effluent through the proposed Havant Thicket Reservoir for us to consume as local residents. There is no shortage of rainfall in this area-why not improve capture and storage of fresh rainwater? As we shall be paying for this £1.2 billion scheme for years to come in our bills we object to the furtive way this proposal is being presented and to the potential £45 million profit to Southern Water's shareholders.<br>Please rethink this proposal now and change your priorities. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 |

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| | | Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We are planning to build new reservoirs where feasible to capture rainfall. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br><br>We will continue to explore options for additional reservoirs across our supply area for our next plan. The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see:<br><br>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8. Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can. |

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| | | Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. We know our past performance was not good enough and we have apologised for that. |
| WRMP755 | "This is my personal appeal to DEFRA to REJECT Southern Water's WRMP. I urge DEFRA to mandate the development of a truly sustainable plan. One that addresses climate change and prioritises environmental protection, rather than pushing for the environmentally harmful and short-sighted option of sewage effluent recycling. Here is my reasoning...<br><br>Southern Water's clearly plans prioritise their profits over environmental impact. It is evident that alternative, much more environmentally sustainable solutions for securing additional water have been sidelined or delayed to ensure that recycling sewage effluent becomes the favoured option. This approach is driven by the substantial profits, estimated at £45M that Southern Water stands to gain from effluent recycling, far exceeding the financial returns from other methods. Ultimately, it is customers who will bear the cost, paying for the excessive debt incurred by this expensive and environmentally questionable choice. This profiteering at the expense of bill payers is unacceptable, especially when more affordable, viable options exist.<br><br>Southern Water's recent credit rating downgrade to ""Junk"" status by Moody's demands immediate reconsideration of their strategy. With credit now much more expensive, they must rethink prioritising costly options such as effluent recycling, as this financial shift will significantly increase their expenses beyond what was originally planned.<br><br>DEFRA needs to change funding mechanisms which clearly incentivise building heavy infrastructure projects instead of encouraging development of more sustainable, environmentally friendly solutions<br><br>Southern Water operates over an area of 10,500 square kilometers with c.800mm of annual rainfall amounting to 8.4 TRILLION litres each year. Combined with Portsmouth Water, they | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding the suggestion that three reservoirs could be built for the cost of the water recycling plant, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth |

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| | supply only 242 billion litres annually (before 20% leakage), capturing just 2.8% of the rainfall. This represents a huge missed opportunity to harness a cheap, environmentally friendly resource. Meanwhile, Southern Water loses 100 million litres of potable water daily, and Portsmouth Water loses 23.6 million litres, totaling 123.6 million litres daily - that's enough water to supply around ONE MILLION customers. Customers are paying for water that's being lost to leaks, a significant inefficiency that must be addressed with more ambition.<br><br>Southern Water, because it suits them to do so, is looking mostly to the long term; It should, in my opinion, be looking at a programme of progressive (phased) delivery. It should start with short and medium term easy sustainable wins and look at ALL options originally on the table and start again. Southern Water does not need to develop a 1 in 500 year drought solution today. Their approach is actually making their job much harder than it needs to be.<br><br>Concern 1: Southern Water's plan is taking the wrong approach.<br><br>Every year, 8.4 TRILLION litres of water fall on the areas served by Southern Water and Portsmouth Water supply. Yet, these companies treat and supply just 242 billion litres annually, using only 2.8% of available rainfall. This vast, sustainable resource could easily be harnessed through reservoir projects, a proven, cost-effective, and environmentally neutral solution. Reservoirs offer far more than just water supply; they help reduce flooding, provide recreational spaces, boost biodiversity, and act as buffers against the significant and worsening impact of climate change.<br><br>Southern Water's £1.2+ billion scheme to recycle treated wastewater into Havant Thicket Reservoir, along with three other effluent recycling projects, is totally unsustainable. The water shortfall could easily be fully addressed by investing in reservoirs and alternative storage solutions. For the same £1.2 billion, three new winter storage reservoirs could be built. Yet, these greener options are not being sufficiently explored, they have been sidelined and DEFRA needs to recognise this.<br><br>Southern Water appears to mislead the public by referencing eight global regions using effluent recycling for drinking water. In truth, only five of these employ the Reverse Osmosis process proposed for Havant, and just one of those discharges treated water into a reservoir—a truly flimsy and misleading precedent for their plans. Most schemes use underground aquifers with long retention times, a far less disruptive and more proven approach. Most of the recycled water in these eight areas is not used for human consumption it is used for municipal, industrial and farming purposes adding further to the deception<br><br>If effluent recycling is deemed necessary for Hampshire, why insist on discharging it into the pristine chalk-fed Havant Thicket reservoir? Why not redirect it into a suitable aquifer closer to the area(s) requiring water? This would address many concerns about the environmental and ecological impact on Havant Thicket. Southern Water has already admitted they have not fully investigated or modelled the implications of their chosen approach, raising serious questions about their decision-making process. | Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The Littlehampton recycling option is a WRMP19 deliverable. It is preselected in the plan consistent with WRPG. The Hampshire Water Transfer and Water Recycling Project is selected before there are no equivalent alternatives with better environmental scores.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 |

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| | Southern Water has admitted that its effluent recycling at Sandown fails to comply with the Water Framework Directive. This critical information only came to light through extraordinary efforts by citizens to access restricted documents - documents Southern Water actively sought to keep hidden from public scrutiny by making it very difficult for its 4+ million customers to see.<br><br>Concern 2: Southern Water's Lack Ambition on Leakage Reduction.<br><br>Given that Southern Water losses in excess of 100 MILLION litres of treated water through its leaking network every single day, enough to supply close to 1 MILLION customers. Repairing these leaks would negate the need to find water from elsewhere. Southern Water says it will reduce network leaks by 53% by 2050 - this simply lacks any sustainable ambition and will result in Southern Water still losing 50 MILLION litres per day every day, enough to supply 450,000 customers.<br>Southern Water's stated plan to replace its network of leaking pipes at a rate that would never actually get leakage under control! A replacement rate of 1 in 1000 years is frankly ridiculous when water main design life is around 120 years. DEFRA needs to recognise this and demand more appropriate measures<br><br>Southern Water has known about its leaks, around 20%, for years and has done very little to address it - it's time for the regulator to step in and stop these unsustainable losses which from a customer perspective looks absurd. Why would Southern Water spend £1.2Bn on recycling our sewage when £1.2Bn would fix the leaks and generate twice the water supply!?<br><br>Industry experts say that if Southern Water properly prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050, rather than the unimpressive, low ambition 53% leakage reduction target they have set themselves by 2050.<br><br>It is both reprehensible and absurd that Southern Water plans to spend vast sums creating water from sewage effluent whilst abjectly failing to address the huge losses from its network. Their plans to cut leakage by just 53% by 2050 simply lack credible ambition when the rewards of recovering water for a million customers are firmly on the table<br><br>Concern 3: Southern Water cannot be trusted to operate complex infrastructure without failure.<br><br>Southern Water has a well-earned reputation for operational failures, which has severely damaged trust in the company. Recent instances of operational failures by Southern Water to operate crucial and complex systems reliably are well documented in the public domain…<br>There is a history of recent treatment plant failures at [redacted] (Hampshire) and [redacted] (West Sussex). Failures appear to be mostly caused by HUMAN ERROR<br><br>Nov '2024: Southern Water's highly complex | million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

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| | Southern Water's new flagship complex stormwater CSO pollution warning system was not working for 4 days without Southern Water even recognising the complete failure to update because of negligent monitoring. The failure was caused by HUMAN ERROR<br><br>Feb 2024: Southern Water was fined for negligently allowing a raw sewage spill lasting up to 20 hours that killed thousands of fish. It was members of the public reporting pollution to the Environment Agency NOT Southern Water's monitoring equipment that detected the spill. The failure was caused by HUMAN ERROR failing to program pumping apparatus competently<br><br>A cursory look at regional news shows that Southern Water has been slow to act or even foresee natural contamination of river and groundwater supply leading to system failure. Increased turbidity in sewage treatment works will inevitably, according to experts, cause significant filtration issues for recycling effluent. Notwithstanding Southern Water is highly regulated, despite regulation it cannot provide a robust service to treat our wastewater without breaching its permits, something it has been subjected to record fines.<br><br>Even a Southern Water state of the art new Sewage Treatment Works suffered technical failure causing unpermitted raw sewage discharges into the environment. Such events across the entire region are not at all uncommon from complex treatment systems simply check news channels for more details<br><br>The complexity of water supply and sewage treatment systems demands high technical competence. The reverse osmosis technology proposed by Southern Water, which has never been used in the UK to produce potable water, raises serious concerns. Southern Water's history of system failures can typically fall into three main categories:<br><br>Human Error<br>• Often occurring during manual interventions or maintenance on automated software-controlled systems.<br><br>Unexpected Environmental Conditions<br>• Increased flows and turbidity in water and sewage treatment due to climate change, overwhelming poorly designed systems.<br><br>Poor Maintenance<br>• Resulting in operational issues.<br><br>These failures suggest Southern Water's design and maintenance processes may well need urgent review. Recycling sewage effluent is a four-stage, highly complex process that relies on software-driven filtration systems and manual interventions. Given the susceptibility of sub-micron filtration to changes in effluent quality, this will likely require manual intervention during adverse conditions. Given Southern Water's track record, this is a significant concern for water consumers, as past interventions have led to pollution and system failures. | The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. Regarding unsightly final results such as concrete embankments, this is a question for Portsmouth Water, which is developing the Havant Thicket Reservoir.<br><br>Regarding the quality of recycled water, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders They have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment. The Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans and that when the Competition and Markets Authority (CMA) makes its PR24 determination it will provide sufficient funding for the investment in the 2025-2030 period. |

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| | Concern 4: Southern Water's Environmental Protection Plans are Deplorable.<br><br>Southern Water is not trying hard enough to to recognise moving river abstractions and abstraction boreholes which yield significant volumes of water and protect the environment. The prioritisation of such abstraction reform is being reduced at the same time sewage effluent recycling priority is increasing. If Southern Water moved the River Itchen abstraction point to the tidal limit, then:<br><br>• the abstraction yield would still be over 50 million litres per day - the same as it is today, only 12km of our precious chalk stream would be protected along with its biodiverse environments.<br>• Costs appear to be around 25% of sewage effluent recycling<br>• Less damaging to our environment and communities from excessive expensive pipe laying<br>• Tiny carbon impact on the environment compared with sewage effluent recycling<br>• Southern Water's preferred options are all schemes with the highest carbon footprint;<br>• they will almost certainly be unable to honour their strategic commitment to be carbon neutral by 2030.<br><br>Examining Southern Water plans's environmental impact tables show that<br><br>• Havant and Littlehampton effluent recycling schemes have the highest NEGATIVE environmental impact score of any of the options considered, and yet there are preferred options.<br>• The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by a fleet of eight sea tankers, and yet all of these options are preferred.<br><br>The proposal to transfer water from Norway via eight sea tankers is utterly implausible. There are no dedicated berths at Southampton Docks, the water's high acidity would require extensive new treatment facilities, and a costly, long pipeline would be needed. This idea seems more like a deliberately unviable option to make effluent recycling appear more reasonable by comparison.<br><br>Construction of infrastructure for sewage effluent recycling will be highly damaging for our communities and for our environment. Tens of kilometres of pipeline interconnecting Havant Thicket Reservoir with [redacted], Pulborough and [redacted] Sewage Treatment works will have a serious impact on both rural and urban environments and habitats. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site with unknown contaminants into the chalk aquifer below adjacent to Langstone Harbour are unacceptably high. Because of (b) above Southern Water should be told by regulators to find an alternative site for their Havant recycling plant. | |

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| | "Business as Usual" operation of sewage effluent recycling will be highly damaging to our environment and the Government's commitment to carbon neutrality<br><br>Southern Water recently trialed reverse osmosis (RO) plants in Havant and also in [redacted], but the results were deeply concerning and cast serious doubt on the technology proposed for full-scale deployment. The trial equipment evidently failed to remove unexpected contaminants and even introduced new pollutants into the output water. Southern Water claims the full-scale technology will differ, raising the critical question: why wasn't the trial conducted with a more representative system to ensure its ability to deliver pure, contaminant-free water? DEFRA should demand answers, as the trial data - FOI delayed for over 12 months, reveals alarming findings:<br><br>• Bacteria: Present in output water, despite expectations of complete removal.<br>• Total Dissolved Solids: Found in levels above zero, contrary to expectations.<br>• Disinfection Byproducts: Detected in output water, absent from input water, suggesting they were created during treatment.<br>• Heavy Metals: Including arsenic, lead, salt, and strontium, found in the output water.<br>• PFAS (""Forever Chemicals""): Traces of PFOS and PFOA detected in some samples.<br>• Pesticides: Present in output water.<br>• Volatile Organic Compounds (VOCs): Including toluene and xylene, found in the treated water.<br>• Trace Organics: Substances like phenol, 1,4-dioxane, and acrylamide detected.<br>• Pharmaceuticals and Personal Care Products: Significant levels found in the output water.<br><br>This trial therefore raises grave concerns about the reliability and safety of Southern Water's proposed RO technology and its ability to deliver the promised water quality. The trial also highlighted several critical oversights and inconsistencies that undermine confidence in Southern Water's proposed reverse osmosis (RO) technology:<br><br>• No Testing for Microplastics/Nanoplastics: Despite knowing their presence in final sewage effluent, Southern Water failed to assess these contaminants in the output water. Recent studies have even detected nanoplastics in human bloodstreams. This is a deeply alarming unknown risk for consumers.<br>• Inconsistent Testing Regimes: Testing parameters for RO plant input and output were inconsistent, particularly when compared with other Southern Water trials at [redacted] and Havant. Why the disparity?<br>• Unaccounted Industrial Effluent: No consideration was given to the impact of tankered industrial waste with unknown constituents at [redacted] WwTW, a significant portion of the input source. | |

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| | • Variability of Source Effluent: The trial revealed highly variable input water (final sewage effluent), including fluctuations in total dissolved solids and turbidity, which advanced filtration is known to struggle with managing it effectively.<br>• No Contingency for Plant Failure: There are no clear plans for managing failures that I could find, which are a real risk given Southern Water's history of systemic issues.<br><br>These gaps raise serious concerns about the technology's reliability, particularly under real-world conditions with inconsistent and unpredictable inputs.<br><br>Very high energy use, £3M per year is a huge electricity bill. Southern Water says that [redacted] WwTW will provide some of the energy for the recycling plant - this is not true as the WwTW is not self-sufficient itself. Southern Water has positioned this plant as a drought resource; however, it must be operated continuously, even when the output is not required for supply. The reverse osmosis (RO) process is highly sensitive and can suffer irreversible damage if production is halted, leading to costly repairs or replacement. As a result, the plant must operate at all times, regardless of actual demand.<br><br>Even with reduced output, the plant continues to consume significant energy, generate carbon emissions, and incur ongoing maintenance and operational costs. This approach undermines its efficiency and raises serious questions about the commercial sustainability and cost-effectiveness of its design, particularly in non-drought conditions.<br><br>The production of highly toxic, concentrated reject materials at each of the four filtration stages poses a significant environmental and ethical challenge. While such materials were previously discharged into the environment with treated wastewater, the reverse osmosis (RO) process expends substantial financial and carbon resources to remove these contaminants. Diluting and discharging this concentrated waste back into the environment is both counterproductive and environmentally irresponsible. Southern Water must develop a robust, environmentally sound plan for their reject stream disposal. The suggestion of dumping them into the sea is not only shocking but undermines the entire purpose of the filtration process from an environmental perspective.<br><br>Serious technical filtration issues are likely if the composition of the final effluent changes unexpectedly. Such variability could disrupt the delicate balance required for effective filtration processes. If manual (human) intervention becomes necessary, Southern Water's track record raises significant concerns about the potential for operational errors or mismanagement. These failures could lead to catastrophic plant malfunctions, resulting in untreated or inadequately treated effluent being released into the environment, causing severe ecological damage. Robust systems and fail-safes must be in place to prevent such outcomes, and oversight mechanisms should ensure accountability and transparency in addressing these risks - and this should have been indicated in the consultation and it was not! | |

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| | The environmental impact on the Havant Thicket Reservoir is still unknown. It has not been examined yet. DEFRA should ensure this investigation is complete before any decisions are made.<br><br>No independent monitoring of recycled sewage effluent into the reservoir has been proposed - this is problematic as is evident from the impact of Southern Water's self-policing of sewage discharges. This is unacceptable - independent monitoring is essential. The visual impact on Langstone Harbour SSSI and Ramsar sites would be significant.<br><br>Concern 5: Southern Water's Openness and Transparency concerns<br><br>The consultation's 35 volumes make it overwhelmingly inaccessible for most citizens to assimilate Southern Water's plans. It took me months to review and understand the content. Regulators should ensure such documents are collectively summarised as a complete body of work to encourage broader participation. Southern Water's use of multiple consultants resulted in inconsistent presentation, language, and style, further complicating efforts to piece together and understand the information holistically. Regulators must require clear, consolidated summaries to enable meaningful public participation. I believe this complexity is deliberate, allowing Southern Water plausible deniability while effectively obscuring critical information.<br><br>Southern Water made it nearly impossible for citizens to access restricted documents, restricting 12 volumes under claims of national security and other nebulous/curious reasons. These could only be viewed under tight surveillance at Southern Water HQ, including audio and video monitoring, and I was even escorted to the toilets. I had to take a holiday from my work and I had to pay for my own transportation to get there that I could ill afford - this demonstrates why only a dozen or so viewers out of 4+ million customers could see these documents. A questionable NDA was also imposed upon those viewers. Upon review, the restricted content appeared to lack legitimate grounds for confidentiality, instead revealing Southern Water's preference for profit-driven, environmentally damaging options. DEFRA should properly review the criteria for restricting documents, as these inaccessible volumes contained critical information essential for meaningful public engagement and little or no apparent confidential content. This significantly demonstrated a lack of openness and transparency in Southern Water's approach and seriously shut down any open debate that should have happened.<br><br>Southern Water has blatantly manipulated the planning process to position effluent recycling as the preferred option, treating it as a foregone conclusion. Despite presenting volumes of data, they fail to provide a clear justification or summary for their decisions. Scathing feedback from statutory consultees, buried in "restricted" documents largely based on public domain sources, raises serious questions about why this information was unnecessarily obscured in this way. This lack of transparency and deliberate obscuring of critical criticism underscores Southern Water's failure in openness and accountability. I noted the absence of justification and selection reasoning and the Environment Agency and Natural England also noted this glaring omission - Southern Waters response to this criticism was abjectly dismissive and DEFRA needs to clarify if Southern Water's response was technically reasonable | |

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| | The Environment Agency recommended: “there is not enough detail on the justification or alternatives - there is a potential for less damaging solutions to have been missed out and not carried forward which would create a greater risk to the environment. There is a potential non-compliance risk of challenge or objection if all relevant info on option selections and the WRMP’s response to the SEA findings isn’t addressed”<br><br>The Environment Agency required the following action: Southern Water needs to include a summary of the option screening process and reasons for selection. Also “provide narrative on the reason why the plans were discounted”, “…further commentary on how the SEA has influenced the dev of WRMP24 options selected and any mitigating and monitoring requirements”.<br><br>Southern Water’s response to the Environment Agency: Summarily dismissed the Environment Agency’s observations and demands claiming its “complicated”. The fact remains that the public still do not have a competent summary of why more sustainable, environmentally friendly options were sidelined in favour of environmentally damaging “pet projects”<br><br>Natural England also noted the failure of Southern Water to provide information on option selection. They say “Southern Water must ensure that all options within its WRMP have been assessed fully. For a number of option Natural England considers that insufficient evidence has been provided to rule out an adverse effect on integrity with sufficient certainty or the HRA acknowledges that there is insufficient evidence at this stage” They gon on to observe that “Natural England found it difficult to review options and determine whether assessment has been completed appropriately both at screening and appropriate assessment stages”<br><br>Natural England also said they “have concerns about the SEA screening and conclusions” and that “..the list of options screened in the SEA and the HRA appear to be different”.<br><br>Southern Water recently conducted its own consultation that was deeply flawed and misleading. The survey focused on customer views about effluent recycling but was heavily biased, framing questions to prevent negative feedback. Now, internal documents reveal Southern Water is using these skewed results to falsely amplify community support for effluent recycling. They claim customer preference scores for effluent recycling are moderate and comparable to aquifer storage; that’s despite evidence to the contrary. This manipulation is unacceptable, and I urge DEFRA to review Southern Water's consultation to ensure it meets regulatory standards.<br><br>The illustration on pages 9 and 17 of Southern Water’s Consultation Brochure is highly misleading , it fails to show that the recycled water will be supplied to potentially Portsmouth Water’s customers in times of drought and emergency with more routine supply after 2040.<br><br>Southern Water appears to be using population growth figures to favour its preferred projects, I am not clear what is being used? With conflicting projections in the consultation/ONS documents creating confusion even for informed readers. This raises serious concerns about | |

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| | transparency and credibility, especially as population growth is a key driver of Southern Water's plans. DEFRA must ensure clear, consistent data is provided and hold Southern Water accountable for transparency, ensuring the public fully understands the basis of these proposals.<br><br>Southern Water's deceptive claims that recycled sewage effluent is widely consumed as drinking water around the world, as suggested in their plans, are largely unsubstantiated. Research indicates that its use is predominantly limited to industrial, farming and municipal purposes rather than direct human consumption. In regions where recycled water is avoided for drinking, such as Singapore, reliance on bottled water has surged, creating altogether different unexpected and significant environmental challenges like plastic waste accumulation. DEFRA should demand that such claims are properly substantiated and disseminated to the public domain. The proposals fail to address whether residents in the Portsmouth Water area will experience noticeable changes in the taste of their water during drought conditions. There is also no clarity on whether the taste will fluctuate over time as the proportions of inputs to the reservoir change. This omission leaves a significant gap in understanding the potential impacts on water quality and consumer experience.<br><br>Public consultation on effluent recycling plants was insufficient. Posters should have been prominently displayed in all areas directly affected by the proposals to ensure local communities were adequately informed. Furthermore, all Southern Water and Portsmouth Water consumers, who stand to be significantly impacted by such a fundamental change to their water supply, should have been properly consulted. This critical engagement was notably absent, undermining transparency and public trust in the process.<br><br>Moody's said Southern's "history of material operational and financial under-performance" could imperil its plans to borrow £4bn from investors. This is a material consideration not currently reflected in Southern Water's planning.<br>----- ENDs -----" | |
| WRMP756 | Firstly, I am writing to express concern that this consultation hasn't been publicised through post, advertisements in the media or via billing. There's been no public meetings held either. I am an Emsworth resident and only discovered the proposal and consultation from a Green Party leaflet through the door.<br><br>I am deeply concerned for my health and that of my young family from proposed sewage effluent recycling and reject this element of the proposal.<br><br>Southern Water have significant leaks across their network and lose nearly 20% of the water they treat and collect only 1% of rainfall.<br><br>The investment should be in stopping the leaks and collecting rain water. This should ensure plentiful supply. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non- |

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| | Southern Water have already been reasonable for many sewage discharge incidents across the South Coast and the areas around Chichester, Emsworth and Langstone.<br><br>Bills have rocketed and customers are not seeing improvements in service.<br><br>I ask that leaks and better rainfall collection provision are exhausted in the first instance and further independent research in produced in relation to sewage effluent recycling on human health. | targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Regarding storage, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP757 | I wish to strongly object to the Souther Water revised draft Water Resources Management Plan on the following basis:<br><br>1. Climate Adaptation and Water Capture: The plan neglects to adapt to predicted climate changes by not prioritising the capture and storage of winter rain for use during dry summers, missing an opportunity to use rainwater as a quality water resource. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting |

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| | 2. Inadequate Review of Alternatives: Southern Water (SW) failed to conduct a full review of the plan, citing cost and time constraints, despite the critical need for sustainable solutions for the rivers Test, Itchen, and Pulborough, and the high volume of objections to previously selected options.<br>3. Focus on Short-term Solutions: The plan prioritises immediate gap-filling solutions over sustainable options, particularly due to delays in recycling options in Hampshire and Littlehampton.<br>4. Effluent Recycling Concerns: The proposed timescales for effluent recycling are unrealistic given complexities, public opposition, and risks, with the scheme likely delayed further, impacting chalk rivers.<br>5. Over-reliance on Drought Measures: Continued reliance on drought permits is extended unreasonably to 2034, risking environmental harm.<br>6. Population and Abstraction Assumptions: SW's pessimistic population growth assumptions drive a demand deficit, while precautionary abstraction reform assumptions further justify unsustainable recycling schemes.<br>7. Leakage and Resource Management: SW loses significant water to leaks, with inadequate improvement plans, impacting resource management despite potential for greater leakage reduction.<br>8. Hampshire Grid and Investment Model: Lack of consideration for the Hampshire Grid improvements and an investment model that favours large infrastructure over sustainable options are notable issues.<br>9. Environmental and Economic Viability: The effluent recycling scheme has high operational costs, carbon impact, and environmental risks, with inadequate environmental assessment and consultation.<br>10. Consultation and Public Engagement: SW failed to engage meaningfully with customers, restricts critical documents, and ignored customer preference for natural solutions, raising transparency concerns.<br>Southern Water have clearly not learned any lessons from the previous plan being rejected and have just rehashed the plan with the expectation that with no alternatives outlined, it will somehow be approved.<br><br>Corporate greed cannot be allowed to triumph over something as basic and vital as our drinking water supply. Please reject this plan and urge Southern Water to properly consult their Clients and formulate a environmentally sustainable plan which will serve the region in the years to come with a lasting legacy. | the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>With regard to short-term solutions, the purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard. The scope did not include a full reappraisal of options for rdWRMP24.<br><br>Regarding delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used |

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| | | a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |

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| | | Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options |

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| | | considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/ |
| WRMP758 | Firstly, how would I know about this proposed development if it had not been brought to my attention by our councillor? Certainly Southern Water have not written to me.<br><br>Rather than recycling waste water into Havant Thicket Reservoir it would be better to collect the winter rainfall (only 1% of which being collected at present) and store it in new reservoirs for when it is needed.<br><br>1/5 of water delivered by Southern Water is lost to leakage. This is an issue which needs to be tackled urgently.<br><br>Southern Water have outrageously not treated effluent effectively. For me, personally, I love swimming in the sea in Emsworth but it is just too dangerous since the sea is so polluted from their discharges. We just can't trust them to treat sewage effluent in a complex new system at Havant Thicket Reservoir.<br><br>DEFRA: please reject the Southern Water plan and get Southern Water to develop a more sustainable plan that works with climate change and puts the environment first. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

| Reference | Feedback | Southern Water Response |
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| | | At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP759 | I strongly support the 5 major concerns regarding Southern Waters WRMP as outlined below:<br><br>1 Collect more rainwater<br><br>2 Address leakage issues<br><br>3 Southern Water current management ineffective<br><br>4 Current inadequate storage capacity of rainwater to be addressed<br><br>5 Risk from developing the effluent recycling plant on landfill unacceptably high<br><br>Thankyou, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates.<br>2. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>3. Your point is noted.<br>4. Our plan currently includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth noting that reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We will continue to revisit and review the potential wider use of Managed Aquifer |

| Reference | Feedback | Southern Water Response |
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| | | Recharge (MAR) and Aquifer Storage and Recovery (ASR) schemes within future water resources planning.<br>5. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP760 | I strongly support the 5 major concerns regarding Southern Waters WRMP as outlined below:<br><br>1 Collect more rainwater<br><br>2 Address leakage issues<br><br>3 Southern Water current management ineffective<br><br>4 Current inadequate storage capacity of rainwater to be addressed<br><br>5 Risk from developing the effluent recycling plant on landfill unacceptably high<br><br>Thankyou, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates.<br>2. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>3. Your point is noted.<br>4. Our plan currently includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth noting that reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We will continue to revisit and review the potential wider use of Managed Aquifer Recharge (MAR) and Aquifer Storage and Recovery (ASR) schemes within future water resources planning.<br>5. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

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| WRMP761 | Southern Water in 2022 made a proposal to use reverse osmosis as the solution to our region's future water supply. They have now continued with this proposal but needless to say have not given much warning to the public of their scheme in view of the originally adverse reaction. The consultation ends 4th December 2024.<br><br>The objections to the scheme could be summarized .<br><br>Reverse osmosis has only been used in desert regions where little rainfall occurs , i.e. is the only option available. That is NOT the case in Southern England.<br><br>The costs of establishing the scheme are very high initially and have significantly increased since 2022 .It will involve very significant sums of money being borrowed increasing the debt burden of Southern Water on which interest will need to be paid ! This appears to me as Financial engineering, a practice which a overseas Bank previously involved with Thames Water is very skilled !! . Could this be the real reason for this proposal being continued.?<br><br>The site of the plant is on reclaimed land at Broadmarsh adjoining the [redacted] water treatment works there is significant risk of leakage in Langstone harbour . An increase in water pollution is not welcome.<br>The proposals involve very significant works in pipeline construction to move water to [redacted] 40 miles away. Inflation will increase both build and running costs which will need to be paid for by customers or the taxpayers,<br><br>The plant will need to run 365 days a year . The membrane's use will need renewing every five year. The plant equipment will need replacement /updating every 10 years over its expected life of 60 years.The operating costs are not mentioned in the proposal . Where is the increased electricity generation capacity needed to run the plant ?<br><br>Portsmouth water has commissioned Havant Thicket reservoir which stores spring water for drinking . Havant residents are welcoming of that scheme but are VERY alarmed that Southern Water intends to pipe recycled water to Havant Thicket.<br><br>Southern Water has discontinued its proposals for a desalination plant on Southampton Water . Whilst desalination is also costly in electricity use it is proven technology in use in England which reverse osmosis is NOT. !<br><br>No consideration appears to other possible solutions to the need for water.<br><br>1. For the amounts of money involved in the [redacted] scheme why not examine sites for water storage at new reservoirs . Should three sites be identified and constructed with suitable treatment plants they could be in use for 200 years. ! These would b e environmentally friendly .<br>2. The new treatment plants could be located downstream of present sites i.e. nearer the river's mouth is benefiting from increased water volume .Therefore nearer to the potential customers | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under ‘serious water stress’ by the Environment Agency. Please see<br><br>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company’s history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

| Reference | Feedback | Southern Water Response |
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| | | Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |
| WRMP762 | As a Havant resident I object to the current proposals because they are not good for the environment, and not good for the residents of SE Hampshire. Particular objection to using treated effluent as drinking water, when there is no need.<br><br>A better plan is to :<br><br>a) Reduce leakage | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. |

| Reference | Feedback | Southern Water Response |
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| | b) Send treated effluent to Southampton (only)<br><br>c) Continue to supply Portsmouth and Havant with raw water. | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>With regard to supplying raw water only to Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |
| WRMP763 | I object to the Souithern Water Proposal for the following reasons (summarised to keep it brief)<br>• Totally inadequate public consultation. Neither Southern Water nor Portsmouth Water has consulted their customers on this. I am a customer of both and the only way I found out about it was by chance!!!!! I object in the strongest terms at being forced to drink recycled effluent when there are environmentally better and cheaper options available.<br>• Very expensive solution, minimum £1.2 billion. How is this best value for customers when they could build 3 new winter storage reservoirs for the same cost! Plus the winter storage reservoirs will have a much better environmental impact i.e. opportunities for recreation and biodiversity.<br>• Massive infrastructure requirements including 40km of pipework plus associated storage and pumping equipment. Totally unnecessary! Greener and cheaper alternatives are being ignored!<br>• Massive risk of pollution both during the build and during normal running. There is a fragile ecosystem around the proposed construction sites (Langstone Harbour and Broadmarsh) and there is a high probability that this will be irreparably damaged by Sothern Water's proposal.<br>• Huge energy costs to build and run the proposed solution. This is not only expensive, it's a far-from-green solution.<br>• Massive loss of opportunity to create the very first chalk spring fed reservoir. Adding recycled effluent to this will damage the ecosystem that could be created. It will also add additional cost as the treated effluent will have to undergo further processing before it is added to the reservoir water!<br>• Safety: Just how safe is this solution? Southern Water doesn't have a great track record when it comes to polluting the environment.<br>• Even if it works, the thought of drinking treated effluent will cause many people to drink bottled water instead. This will create its own environmental nightmare. How many plastic bottles will be bought and discarded unnecessarily?<br>• Why not investigate properly the other greener alternatives and force Southen Water to spend more money on fixing leaks? Some of the alternative solutions:<br>o Move the river extraction point closer to the tidal limit<br>o Collect and store rainfall during winter | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |

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| | o Become part of a UK network to be able to move excess water from one area to another when needed.<br>Please, please reject the Southern Water Proposal. Protect our environment, our water and the new Havant Thicket Reservoir. | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>Regarding effects on coastal water bodies, A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction |

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| | | licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding a national network, South East Strategic Reservoir Option (SESRO) in the vicinity of Abingdon is being jointly developed by Thames Water, Affinity Water and Southern Water as a regional solution. However, for the purpose of WRMP24s, it is included in Thames Water's WRMP24. Sensitivity analyses were carried out by using different sizes of SESRO as well as excluding SESRO altogether. The results show that if SESRO cannot be built, it will need to be replaced by a large transfer from Severn Trent Water to Thames Water or another reservoir. For further details, see Section 10 of Thames Water's WRMP24 https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/wrmp24/technical-report/programme-appraisal.pdf<br><br>The Thames Water to Southern Water Transfer (T2ST) proposes to convey potable water from Thames Water's Swindon and Oxfordshire water resource zone to Southern Water's Hampshire area. As there is not currently a surplus of supply within the Thames Water Resource Zones, the solution is dependent on the prior development and commissioning of an additional water resource option – the River Severn to River Thames Transfer (STT) and/or the South East Strategic Reservoir Option (SESRO). The T2ST pipeline will not convey untreated water from the River Thames, but will convey treated potable water that has been sourced and treated either from a new reservoir (SESRO) and/or by a direct water transfer from Severn Trent (STT). More detailed information on the T2ST scheme is available https://www.thameswater.co.uk/about-us/regulation/strategic-water-resource-solutions/water-transfer-from-thames-water-to-southern-water |
| WRMP764 | This email is a request for Defra to reject the Southern Water Revised Draft Waster Resources Management Plan.<br><br>My principle concern relates to the Havant Thicket reservoir. This project initiated by Portsmouth Water has been hugely controversial locally. Eventually permission was given for the project to go ahead based on the assumption that it would enable clean spring water to be stored before it was injected into the water supply. I accept this decision and believe that the project should now go ahead.<br><br>The project has subsequently been hijacked by Southern water for use as a storage site for treated effluent. This is a step too far, and I strongly object because:<br><br>1. There will be contamination in this water. I understand that it is virtually impossible to remove traces of drugs, both legal and illegal from treated water. This contamination will be carried over into the wildlife in the reservoir – primarily birds and fish.<br>2. I regard Southern Water as completely untrustworthy in their ability to make absolutely sure that the operational systems perform to the promised specification continually. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Regarding the quality of recycled water, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including |

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| | 3. Southern Water have lied again and again about their discharges and the manner in which they are recorded. They have to be made to understand that there are consequences to this disingenuous behaviour. Trust in Southern Water has been destroyed.<br>4. There are other less risky ways to support the water supply – most effectively by having a zero tolerance of leaks in the system.<br>5. My understanding that this scheme requires water to be continually pumped from sea level up into the South Downs, using large quantities of energy.<br><br>I hope that you will therefore reject this proposal from Southern Water. | "forever chemicals" in the purified recycled water produced. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |
| WRMP765 | This ridiculous and hugely costly development should not proceed further for the following reasons:<br>1.COST<br>At £1.2 billion we will be landed with an HS2 -type disaster. That cost estimate has been spiralling upwards and will continue to do so. The running costs are likely to escalate too, and are considerable. All the machinery is forecast to last only 60 years, then we start all over again . Far more effective and much longer lasting would be 3 new reservoirs for the same cost , and they would last 200 years with much smaller running costs. The recycling scenario has not been used before in the UK, and it is all too easy to imagine costs escalating as with HS2. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | Rain is cheap,falls out of the sky in abundance, and climate change will bring heavier winter rainfall to compensate for the drier summers,and extra reservoirs will catch the winter rains.<br>2.HAZARDS<br>There are too many hazards with this scheme.:<br>Disturbing the landfill site, a time bomb of toxic solvents and hydrocarbons- which would be likely to leach into the surrounding environment.<br>Dumping reject water from the effluent recycling process into the Solent -we've already seen what Southern Water have achieved with water quality in the local harbours and Solent. The harbours will become totally unsafe [it's not good already] for recreational sailing,paddleboarding,etc<br>3.INADEQUATE AND RUSHED ASSESSMENTS OF THIS AND OF ALTERNATIVE SCHEMES<br>There appears to have been a reluctance to look at other,much less environmentally dangerous,schemes. The whole thing appears to be pushed through with indecent haste, and with totally inadequate communication from Southern Water. Why in these climatically and economically challenging times are we not looking hard and long at the other far cheaper and less costly to run alternatives, ones that are much less damaging to the environment?<br>Could it be that the £45 million profit to be made by Southern Water is a factor in this?<br>Please DEFRA do not allow this dreadful scheme to go ahead | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th |

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| | | December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP766 | It is understood that Southern Water proposes to pump sewage effluent into the new reservoir at Havant Thicket, which was originally approved by Havant District Council to store pure spring water for distribution to the residents living in the South East area served by the Portsmouth Water Company.<br><br>I am OPPOSED to the latest proposal to pump sewage effluent to mix with the pure spring water at the HT Reservoir<br><br>This process is energy intensive and unsustainable. Due to climate change, we have the opportunity to set an example and also adhere to our sustainable commitments through the use of an energy efficient and sustainable solution for the effluence.<br><br>There is no public trust in Southern Water which has chosen profit over people for too long. They have dumped sewage in our rivers and sea and has lost public trust. There has been a public outcry and all you have to do is note the first upset in the local election for MPs—which had mostly to do with the sewage issues and Southern Water.This trust will no doubt carry on to lack of trust in drinking recycled sewage water and could lead to countless households purchasing bottled water.<br><br>We must:<br>• We request that you demand that Southern Water do more to repair leaks and replace mains. If they put the funding & priority in they should be striving to achieve a 70 % reduction in leakage by 2050.<br>• Educate the people from child to elder about the importance of conserving water.<br>• Provide incentive to harvest rain water for gardens<br>• Create more reservoirs· An in depth independent review of the ability for SW's recycling engineering to satisfactorily cleanse the recycled effluent removing all known chemical pollutants and pharmaceutical contaminants by independent specialists in this field.<br><br>Furthermore, we request that the authorities conduct: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Regarding the quality of recycled water, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We have dedicated budget for both proactive and reactive |

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| | • An in depth independent review of the entire proposed infrastructure by independent qualified professionals in this field be published.<br>• An in depth independent review of the costings of all the proposed infrastructure, pipes, pumping stations, etc. by independent financial advisers.<br>• Total cost analysis of the on going maintenance required for a project that will be required to run daily all year round and not just in drought conditions and to forecast the life time of such a project.<br>• An independent review of the state of the infill-site at Broadmarsh which will be cut open to enable all the 45kms of piping required to transfer the water to the [redacted] pumping station and beyond.<br>• Forecasting of the chemical and health impacts the opening of this infill site will have on the harbour and communities.<br>• Full review of the life cycle emissions<br>Please note, I am 100% in favour of the original plans for the Reservoir primarily because we need to store water in the rainy months so that we can have water during drought or times with less rain. Our catchment is particularly vulnerable due to the karst in the chalk and the water flows quickly through small fissures in the chalk to the source. It makes sense to conserve it in a reservoir/s.<br>The site is designated by the Environment Agency as a “Principal Aquifer”, one of only 11 such sites in the UK. It is also within an Aquifer “Source Protection Zone” classified as “Outer Zone 2”. Our water supplies are extracted by Portsmouth Water (PW) through the Havant and Bedhampton Springs, 6 km to the SW of the site.<br><br>Clean groundwater is precious, finite and essential for health, the environment and our infrastructure. Our groundwater catchment is vulnerable and it is our duty to support, conserve and protect this fragile groundwater ecosystem and to promote catchment management approaches that will ensure its purity and longevity.<br><br>Many thanks for your consideration of these points. | maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Our home visits programme and schools programme are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water.<br><br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP767 | I object to Southern Water's draft Water Resources Management Plan.<br><br>As both a Southern Water (SW) AND a Portsmouth Water (PW) consumer, I am especially concerned with the creation of an Effluent Recycling Plant at Broadmarsh (ERP) and its use for pumping "treated" effluent to the Havant Thicket Reservoir.<br><br>ISSUE 1<br><br>The South and SE are vulnerable to water stress. The UK is suffering far more frequent and intense storms leading to localised flood events mostly in Winter, but also in Spring and Autumn. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under ‘serious water stress’ by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a |

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| | The UK only collects about 1% of rainwater so the solution is not in RECYCLING dirty water from the [redacted] Waste Water Treatment Works (WWTW) to pump it to Havant Thickett reservoir (or any other). The solution is to IMPROVE storm water capture and storage across the region AND/OR abstract water further downstream closer to estuaries where greater volumes (especially after floods). can e captured.<br>Broadmarsh is a former waste tip with huge risks to groundwater contamination during construction works, directly impacting on the Habitat "Protected", Langstone Harbour and would be the WRONG location anyway.<br>SW's own Preliminary Environmental Information Report confirms there is a likely significant effect resulting from discharge of the concentrated reject water on the Solent "Protected" sites.<br><br>ISSUE 2<br><br>PW had applied for, and were granted approval (15/10/'21) for a Reservoir to store pumped Spring Water from Bedhampton Springs to Havant Thickett as a Drought Response. PW is only under "moderate" stress from drought. In Winter it currently returns far more than needed (according to PW's Consultation in 2020). It will have a minimum storage capacity of 8,700 million litres (Ml), and capture rainwater. The pumping from the Springs will only be required in extreme (currently defined as 1:200 year) drought conditions at a rate of at least 21Ml/d.<br>SW is not constructing an ERP for PW customers. The Havant Thickett approval was not therefore granted to take recycled effluent. The fundamental purpose of the original application for a reservoir for raw water storage has significantly changed. Effectively, SW is attempting to subvert full public engagement by using Havant Thickett for another purpose.<br>According to SW in their July and August 2022 initial consultation on the re-cycling of "dirty" into "treated" water pumped to Havant Thickett, they had PW's approval. That's NOT how PW Consulted with us in 2020.<br>PW is NOT intending to monitor water quality in their new Reservoir but instead rely on SW. Water Quality needs INDEPENDENT monitoring.<br><br>ISSUE 3<br><br>The UK has committed itself to Net Zero Carbon Emissions in 2050. The SW Broadmarsh ERP is on the coast approx 10 -15m above mean sea level. Havant Thickett is over 40m above. Constantly supplying and pumping 365 days/annum even when it's not needed is hugely energy demanding and entirely wasteful.<br>SW is also intending to pump treated effluent up 90m to Portsdown Hill to gravity feed therefrom to a Water Treatment Works OVER 40km at [redacted], increasing energy demand even higher.<br>The stated aims of the UK Gov't are to "build on our ambitions set out in the British Energy Security Strategy and the Net Zero Strategy for increasing the overall share of domestic energy production and reducing ENERGY DEMAND":-<br>https://assets.publishing.service.gov.uk/media/642708eafbe620000f17daa2/powering-up-britain-energy-security-plan.pdf | number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) on in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |

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| | ISSUE 4<br><br>The financial burden to SW consumers of a new ERP at Broadmarsh and pipes to Havant Thicket Reservoir is now £1.2 to 1.4 billion (excluding the "Thickett" Reservoir construction costs) or £30/annum per customer.<br>Three Winter storage reservoirs could be built for the Broadmarsh ERP (the estimated cost for the construction of the Havant Thicket Reservoir is £350 million).<br>The [redacted] WTW meanwhile is not expected to be served by Broadmarsh until 2035/40 and in drought conditions could be expected to rely on Ocean Going Tankers from Norway. The drought of 1976 is almost 50 years ago but SW was privatised 35 years ago in 1989 and has a huge leakage rate of 19%. SW is a company that fails to plan ahead and fails to manage the infrastructure it already has.<br><br>ISSUE 5<br><br>SW's [redacted] WWTW persistently fails. It discharged raw sewage into the "Protected" Langstone Harbour for 181 hrs in the eight days between 24th October and 1st November 2024. This is NOT a new failure.<br>SW is able to earn profits from investing in NEW infrastructure but not from maintaining pre-existing infrastructure.<br><br>ISSUE 6<br><br>Drinking water from the Havant Thicket will NOT have the same safety protection as the approved scheme will because SW's practice is unreliable and the natural PH balance and chemical structure is changed.<br><br>Conclusion<br><br>There is No Economic, Environmental, or Social Benefit in DEFRA authorising the grant of a Development Consent Order for Effluent Recycling Plant at Broadmarsh. | The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable |

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| | | parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP769 | I am writing to ask you to reject Southern Waters plans to recycle sewage using the proposed reservoir in Havant Thicket.<br><br>I have so many concerns about these proposals which were added after planning was accepted for the reservoir. The top concern for me is that Southern Waters do not seem to be able to manage their current infrastructure, with so much drinkable water just leaking out from holes and never reaching homes, and not able to deal with the amount of waste water. I am aware that water companies are allowed to just discharge untreated waste in times of high rainfall, but southern release water when it even drizzles, or rains lightly as a one off. They seem to be unable to deal with the slightest extra rain and all the while even more houses are being built.<br><br>I think if they accepted this, and were honest about discharges, and were investing in their infrastructure to improve matters, then that would be something. Instead they are trying to be secretive about discharges and giving pay increases to their high level managers that are well above what they should be getting, particularly as they are not performing very well, in either their function or in improving confidence in their company.<br><br>I have recently done some research into the water recycling system they are proposing, and it is fairly new in the UK. I can see the attraction, you can effectively make 80% drinkable and then only need to dispose of 20%. When I asked about what would happen to the extra concentrated wages, I believe the proposal is to discharge it using the long outfall, so just have free licence to discharge it continually without any treatment.<br><br>I have also seen that the process is complex, and it is common that some of the filters block and need flushing out etc. I am extremely concerned that southern water will plow ahead doing the least possible to be able to continue to pay shareholders, and not really make sure that they plan contingencies to deal with this scenario. In short, this is complex and southern water have been clearly incompetent and untrustworthy in their current operations, so there is a huge concern. The risks of this proceeding are huge, because there is a big chance that the water in the reservoir will be compromised, if not with sewage, with other contaminants from the waste | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household |

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| | water, and that our local harbours and beaches will continue to be contaminated with untreated waste.<br><br>I think it would be much better if Defra were to work with southern water to invest in sustainable solutions that are tried and tested locally, such as using the reservoir to collect rainwater as originally planned, stopping the leakages in treated water, and improving current facilities to deal with waste water to allow the system to cope with more houses and a bit of rain! We are all so upset with Southern Water, as we feel we can't even swim in the sea in the summer anymore. I don't even attempt to visit the beach if it even rains a spot in the previous 48hours, and me and my family have all had bad stomachs after swimming even so.<br><br>Please do investigate their current operations and speak with local groups such as surfers against sewage etc and please insist that they get their house in order before using us all as Guinea pigs for this complex technology. | and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>We note the objection to the use of recycled water in Havant Thicket. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP770 | I am writing to express my objections to the Southern Water revised draft Water Resources Management Plan (WRMP) 2024, which includes using the Havant Thicket Reservoir as a holding place to store water recycled from effluent. I understand that the consultation process ends on December 4th, though it seems to be a shoddy attempt at consultation as it is not well advertised and so remains unknown to many interested parties who may have wished to give their view had they known. Also, accurate information on the project from Southern Water is difficult to find; this lack of communication and transparency is worrying. This is not the way to run an accountable consultation process and it engenders mistrust. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our |

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| | The Southern Water 'Water Resources Management Plan' (WRMP) was rejected by DEFRA in 2023. I believe that the new iteration has not substantially changed, the same issues remain, so I'm not sure why we are reviewing it again. Other options were put forward for consideration by those concerned last time, ones which could provide more acceptable solutions to the problems of potential drought. However, these do not seem to have been seriously looked at by Southern Water. The initial proposal of a reservoir constructed to hold fresh water was accepted by DEFRA and the local communities a few years ago; I suggest that trying to change usage to an environmentally UNfriendly one which does not adhere to the needs of the people or the planet is sly and shows lack of respect to both expert and public opinion.<br><br>The current plan being proposed is incredibly expensive, both financially and to the environment. The pumping and treatment that the Hampshire scheme would need would cost more than £3 million a year, with pumping (and therefore energy use and carbo emission) taking place constantly. This constitutes an enormous carbon footprint, and for what gain? It is proposed that the water is for use in case of times of drought – no one yet knows if there will actually be a summer water shortage, and if there is there has to be a more earth friendly way to ensure a better supply. At a time when climate change and protecting green spaces and diversity of species are in everyone's minds the plan presents an industrial solution to a potential problem without acknowledging or exploring the gains that could be made by more efficiently using what we already have. For example, in the UK only 1% of rainfall is collected. As rainfall in the winter months is forecast to increase surely attempts to harvest more of this would be advantageous and less costly. Also, I was shocked to learn that leakage from the Southern Water freshwater system is as high as 3% before it reaches treatment, and 19% in the distribution network (which has been treated and therefore constitutes a waste of energy and customers money). Investment in the infrastructure of this current system would provide immense gains in available water volume.<br><br>Southern Water do not have a good record of maintaining their current infrastructure and pollution incidents where effluent has entered Hampshire coastal waters and rivers are already well documented. Their track record is such that I do not believe they can be relied upon to manage a highly complex sewage treatment process without considerable pollution risks detrimental to both humans and the environment. If there were difficulties at the recycling plant contaminated water would enter the reservoir thereby fouling the reservoir as a whole, and consumers would have valid worries about consuming the water. What the county does not need is mass purchasing of bottled water by residents wishing to safeguard their health. There are also concerns that the deep drilling necessary to construct the system would be on a totally unsuitable site. The Broadmarsh site is an old landfill site containing unknown materials, including toxic waste. The very real dangers of this leaching through the chalk and into Langstone Harbour, thereby damaging the ecosystem there, seem to have been ignored. This is unacceptable.<br><br>In conclusion, the current Southern Water proposal has very un-green qualities that should be raising red flags all round, and they have paid no heed to recommendations made or views given. I reiterate:- | website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br>"https://waterresources.southernwater.co.uk/find-out-more/"<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We have received 1176 responses as part of rdWRMP24 consultation. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased |

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| | • Southern Water has not been transparent in this consultation process, which rather misses the point of consultation<br>• The energy needs of the plan are way too high and cannot be countenanced when the overall need of the world is to reduce carbon emissions<br>• Southern Water have failed to explore more cost effective options which make better use of the water already available<br>• Southern Water are showing no respect to the environment in pursuit of this plan<br>• Southern Water appear to be ignoring the safety concerns of the public and knowledgeable experts<br><br>I strongly urge DEFRA to both reject this proposal from Southern Water, and to insist that they look to more environmentally friendly solutions to any potential water shortage. | results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | | this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring |
| WRMP772 | I do not want for myself my children and grandchildren to be drinking water that is not spring water this is perfectly healthy and local.<br>I'm not convinced that southern water can be trusted to treat effluent in drinking water supplies as they have a terrible record locally with maintenance ( complete lack of it) .<br><br>People's health should be the priority we are going backwards with regards to water treatments.<br><br>Please do not allow this to go ahead. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead |

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| | | after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP773 | I object to Southern Water WRMP plan on the following grounds:<br>• It does not work with Climate change but instead contributes to it.<br>• The level of need is overestimated by high figures for population growth and exclusion of other potential water sources from the plan.<br>• It ignores and parks more sustainable and longer-term solutions.<br>• The options in the plan are the most expensive and the most environmentally damaging.<br>• It ignores the pollution risk to the harbours, Havant Thicket reservoir and the countryside.<br>• It has shelved the use of [redacted] as a site for Reverse Osmosis treatment plant.<br>• It takes no account of the improvements to the Hampshire grid which enables water to be moved to area of high demand.<br>• The Reverse osmosis recycling option delays protection of the iconic R. Test and Itchen until 2035 or later, whereas a twin track approach to include moving the abstraction and the Test MARS aquifer would give protection at an earlier date.<br>• It is too slow to fix the level of leaks and replace mains.<br>• It fails to include effective methods to reduce consumer demand by removing the threat of hosepipe bans, and tiered billing.<br>• It increases the energy and electricity demands from the National grid (which the same company own) at a time when our own electricity generation is not meeting our needs and we are dependent on importing more of our electricity.<br>• It fails to address the consumers' resistance to drinking water processed from sewage effluent recycling which has created a plastic bottle mountain in Singapore.<br>• Southern Water have a poor record for managing the simpler and well established and understood technology and their ability to manage the much more complex technology of Reverse Osmosis and desalination is a concern.<br>• There has been a lack of effort to inform the public about this consultation and a lack of transparency in the presentation of the plan.<br>• Southern Water's owners are Macquaire Bank. This bank has a record of raising debt levels, poor regulation and systems and Southern Water's shares are already junk status.<br><br>I do recognise that the climate change and population increase is creating pressure on water supply. The decision taken by DEFRA on this plan will affect people from as far away as Medway to the New Forest. However, this plan fails to look at more realistic and sustainable options for drought management including proposing to tanker water from Norway during drought instead. Tankering is the plan for droughts before 2035, assuming the Hampshire Water Transfer is operational by then, which is not guaranteed. The water from Norway is acidic, is a biosecurity risk, excessively expensive and allows for further delays in meeting the need to source water in the region. I object to this unsustainable plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1,176 responses as part of rdWRMP24 consultation.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ |

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| | This plan work against climate change rather than with it. The emphasis on desalination and effluent recycling which would deliver up to a one – third of the projected demand in the future is unsustainable and unwise. Accepting this plan will make water much more expensive, add to drivers of climate change and the costs will force poorer people to ration their water use with potentially health damaging consequences.<br>Given we only collect 1% of our rainfall and we do not have the capacity for solar energy that countries which use reverse osmosis and desalination, this scheme does not fit with our geography or environment. What is plan does is create huge debt and our water bills will be made up of 50% interest payments or even more. Other options have not been properly investigated.<br>The cost of this the Hampshire water transfer scheme from Havant alone has increased at an alarming rate from 550 million in June 23 to over 1.3bn in November 24. The operational costs are 395 million pounds but it is known that the energy required, the amount of chemicals and the filters are very expensive, need specialists to manage and, when Thames Water built a desalination plant previously, it was too expensive to operate, failed to work more often than it was functioning and failed to deliver any water in 2022 drought period. Reverse Osmosis filters only last 6-7 years at best. Southern Water has a poor record and culture of fixing only when there is a failure when maintaining their operations, hence the number of fines they have received. So, can SW be trusted to manage Reverse Osmosis?<br>The business case for Southern Water plan is based on population figures which are inconsistent across their documentation and for the periods over which growth is forecast. The assumptions are there will be no reductions in demand from consumers nor will there be a capacity to move water via the Hampshire grid to area of shortages. The population figures in Southern Water's documentation average 23% rather than 16% the ONS figures for population growth in the same period. Southern Water have based their figures partly on Local plans but 70% of these are out of date.<br>Sustainable solutions such as moving the abstraction on R. Itchen and Test to the tidal limits have not been considered and the Arun Reservoir and Test MARS aquifers have been parked from this plan. This means the Environmental agency have been unable to make any assessment of these alternatives. Whilst Southern Water are saying moving the abstraction would increase the salinity in the Estuaries, this can only be true if the amount of water abstracted were to be increased. Moving the abstraction of itself would not change the volume of fresh water flowing into the estuary. And the Environmental Agency has had no opportunity to make an assessment as this option is not in the WRMP. Moving the abstraction on the River Itchen is much cheaper, sustainable and could be delivered much more quickly than effluent recycling, if the investigation and planning work started now, with tunnelling techniques used for the 9km pipeline needed to ensure no significant impact on the river protecting the full length of the freshwater catchment and its ecology. If the abstraction were to be moved to the weir, this would reduce the need to reduce abstraction, saving money and the environment. Yet Southern Water are not even planning to look at this until WRMP29. That is not acceptable. Moving the abstraction makes much more sense than the Hampshire Water transfer scheme. It is cheaper, does not necessitate cutting tunnels across 40km of countryside and would last a lot longer than the 60 years of an Effluent recycling plant. | level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons.<br><br>Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Our estimated cost for Havant Thicket Reservoir is included in our Water Resources Planning tables. We do not recognise the figure for £1.2 billion for the reservoir.<br><br>We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan. The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |

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| | The Hampshire Water Transfer scheme is also the most environmentally damaging option. Southern Water's preliminary Environmental own assessment of the impact of the Effluent recycling from Budd Farm in Havant states there is likely to be significant effect on the Solent of the 4 to 5 times more concentrated reject water from the Effluent recycling plant. The concentration of pesticides, forever chemicals and pharmaceuticals are a particular concern. An ongoing study at Portsmouth University with Oxford University is producing evidence that these chemicals are having detrimental and significant effect on the fauna and flora of Langstone Harbour. Given that we are already one of the world's most nature deprived countries and the fragility of food webs due to the rapid increase in world temperature, this is an addition threat to food security.<br>Desalination and Reverse Osmosis processes must run continuously using chemicals and energy. Regardless of the need for water, the Reverse Osmosis plant has to process 30Ml/day and this highly complex process which even when working at its optimum, will not remove all contaminants. Given SW dire record on managing well established and much simpler technology, we do not believe we can trust them to manage this extremely technical process.<br>Southern Water's Effluent recycling plant based in Havant is to be built at Broadmarsh, an historic dilute and disperse Landfill site. This site is known to contain solvents, hydrocarbons and asbestos. The bedrock is chalk where there are water courses beneath. Therefore, there is a high risk of opening these, accelerating the leakage of pollution directly into the Langstone and indirectly into Chichester harbour. These harbours are already under pressure from the high levels of nutrients released from the adjacent sewage works at Budd Farm. This site is adjacent to Ramsar wetland, and a SSSI and a SAC. an area heavily used by birds and sites of internationally importance for birds. Construction here will disturb and cause the birds, already under pressure from habitat loss and climate change.<br>The option to use [redacted] instead of Broadmarsh has been shelved despite it being closer to areas most in need, where there is more room and not is on the coast, therefore reducing the environmental risks, needed a shorter pipeline, less energy to pump the water to [redacted] and less disruption to the countryside.<br>The WRMP fails to emphasis leakage reduction and demand management in an urgent manner. It also ignores the Hampshire gird which will enable water transfers. Moving abstractions downstream and using aquifers to reduce the pressure have been delayed for 8-10 years, creating a shortage in supply meaning this plan has no alternatives, thus restricting the choices in this plan to be between the highest cost and most environmentally damaging option and no choice. By delaying these, the EA are blocked from assessing these alternatives.<br>In Havant Borough we have a new reservoir, the only chalk stream fed reservoir in the world which is to be used as an environmental buffer for a recycled Effluent plant using reverse Osmosis. This means it will have no protection for any environmental impacts due the purified water being sent continuously which will have a different chemical composition and a significantly raised temperature, increasing the risks of algae blooms. This use, for which the Reservoir was not originally intended, will have significant effect on its ecology.<br>The timescale for delivery is unrealistic. The Havant Thicket reservoir scheme is already delayed by two years and wet weather and technical problems is highly likely to cause further delays and expense. | The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12). The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst |

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| | There has been a lack of publicity about this consultation. There has been no noticeable social media campaign. There are no posters where the proposed infrastructure will b e built or notification to all the customers of Southern Water. Southern water ruled out the option of telling people on their bills. There has been a lack of transparency. Documents which were restricted that did not compromise security or commercial interests. The documents contained inconsistencies and made it extremely difficult to work out what was going on and excluding the public from being engaged. There is no clear justification for the options selected, and the Littlehampton and Havant Effluent recycling system are the most environmentally damaging.<br>Conclusion<br>I ask you to consider that the plans proposed are rejected and SW are told to bring forward alternatives that can be investigate by the EA alongside those for increasing water capture and moving abstraction. I also ask that Ofwat rules are changed so they are fit for purpose and that the Green House Gas emissions are included for all schemes and that they are given full weight in the decisions.<br>I also bring to your attention the history of the owner of Southern Water, Macquaire Bank. They were the owners of Thames Water until 2017, during which time the debt jumped from £3.4bn to £10.8 bn and they earned to nickname of 'Kangaroo Vulture'. On 28th November, 2024, the Times newspaper announced that the City of London regulators fined Macquaire 13 million pounds for serious failings in its management and systems. Is this a company we can trust to deliver a fair service for a fair price?<br>So I ask that DEFRA oblige Southern Water to prioritise the following in this Water Resource management plan:<br>1. Fixing leaks at a faster rate than 53% by 2050 so at least 70% are fixed by that date. Over 100Ml/day of water that has been processed and paid for by customers are lost by Southern water. The rate of mains replacement by Southern Water has been well below the rate required. Allowing Southern Water to proceed with their plans for Reverse Osmosis and Desalination when 19% is lost in leaks is a burden on the population and mostly on those who can less afford it.<br>2. Include the option of moving abstractions to the tidal limit so it can be investigated by the Environmental agency. The plan at the moment, eliminates all other choices and condemns us to an expensive, profit driven options which are against the interests of the British people allowing our hard-earned cash to go overseas and out of our economy.<br>3. Allow water to be abstracted from rivers when the water levels are high and therefore use the free, sustainable, environmental and climate supporting rainfall to be used for the good of all consumers.<br>4. Increasing the storage of water in reservoirs and contained aquifers which will, in combination provide enough water for a 1 in 200-year drought.<br>5. Retain the threat of hosepipe bans as a tool to educate and nudge the public and businesses to manage their water more sustainable and use tiered billing to reward and incentivise reductions in consumption so the wasteful pay for those who conserve.<br>We need to be on the right side of history and make sustainable decisions, not the ones that create more greenhouse Gases and biodiversity loss. This plan will increase debt. It will increase the price of a vital resource to the British people, whilst enriching foreign banks and venture capitalists and damaging our economy. | having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice |

| Reference | Feedback | Southern Water Response |
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| | | measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Yes, desalination is an energy intensive process. However, the drawbacks of any option have to considered in view of the benefits it delivers. We have excluded desalination options in cases where drawbacks outweigh benefits or where the environmental challenges cannot be satisfactorily overcome.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP774 | I wish to express my concern at the proposal to use recycled sewage effluent as part of our drinking water supply. I am concerned as it will mean a treatment plant on the coast at Broadmarsh, and given its current record on pollution I simply do not trust Southern Water not to cause more problems around our local shores.<br><br>I am also very concerned about the economics of this proposal. I read that about 20% of Southern Water's supply is lost to leaks, and I feel that reducing this amount massively would be for better for the environment overall and also a great deal less expensive. This must surely be a more sustainable solution to potential water shortages.<br><br>I also feel that since the original proposals for the Havant Ticket reservoir, which I fully support, there has been a continuous creep of what the company wants to do, and again I simply do not trust Southern Water. Where will their proposals finally end? | Thank you for reviewing our rdWRMP24 and providing feedback. Your concern about the use of recycled water in Havant Thicket has been noted.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each |

| Reference | Feedback | Southern Water Response |
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| | | successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |
| WRMP775 | I am writing to strongly object to the plans by Southern Water to recycle sewerage effluent into our new reservoir. My family have no desire to drink sewerage however filtered. There is plenty of rain falling from our skies that should be harnessed more effectively and many many leaks that need to be repaired.<br><br>While I am writing I walk the Emsworth shoreline daily and it is so obvious when there have been discharges. Not only people using the water for recreation but dogs as well have become very ill after drinking the water in Emsworth harbour and there is also pollution you can see (in the water at the bridge leading to Nore Barn woods)from the field that drains into the harbour. This water used to be crystal clear and some days it is…..but mostly it has the scum on the tide of sewerage.<br><br>I am a very concerned resident of Emsworth. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Our plan also includes building of two storage reservoirs, Havant Thicket and SESRO.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP776 | We wish to object in the strongest possible terms to Southern Water's Water Resources Management Plan,<br>and urge DEFRA to reject it.<br><br>We will not repeat here the environmental and cost implications that have been so ably identified by other objectors.<br>Suffice to say we are in total agreement with them. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The relationship between Southern Water and Portsmouth Water is that of neighbouring water companies. Southern Water and Portsmouth Water are entirely separate and independent companies but have commercial arrangements to transfer water across their respective boundaries. If there are any failures, such as losses of supply to Southern Water customers then Southern Water is responsible, if the failures affect Portsmouth Water customers then |

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| | Additional objections<br>Our additional objections question the business relationship between Southern Water and Portsmouth Water.<br>I have asked both companies on several occasions for clarification; no response has ever been received.<br><br>There is a complete lack of transparency in this business relationship.<br>How is any government investment to be shared by two companies?<br>What will happen in the event that both companies are nationalised by this or a future government?<br>When an ecological disaster happens, as it surely will, are the financial consequences to be shared equally between SW and PW?<br><br>With two companies involved, each can hide behind the other, lay blame at each other's door, and double charge their<br>customers.<br><br>DEFRA should start by untangling this business relationship, buy out SW's investment in PW, and ensure that the<br>Havant Thicket Reservoir is wholly owned by a single company: Portsmouth Water. | Portsmouth Water is responsible. Portsmouth Water is a 'Water Only Company' meaning that within its area, it provides water services. Southern Water provides wastewater services in the area Portsmouth Water supplies for water. |
| WRMP779 | Some time ago, I took part in a guided walk around Staunton Country Park and was impressed to learn of, then see, work for Havant Thicket Reservoir. I understood it was to collect natural spring and rain water. How wonderful to forfeit some land for an energy efficient and environmentally kind arrangement to store water needed.<br><br>For Southern Water to propose pumping "treated" water into this reservoir seems completely unacceptable and out of order.<br><br>A. Natural water is available here. It would be irresponsible to pump "treated" water into it.<br><br>B. If more water is required elsewhere, eg Southampton, why not pump the proposed "treated" water directly to their supply source.<br><br>C. Southern Water's priority should be given to timely repairing and replacing pipework, along with managing their huge sewerage and discharge problems. How can we trust them with this proposal. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Regarding distance from customer centres, using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP780 | I would like to lodge my objections to Southern Water's WRPM (Water Resources Management Plan). My objections are laid out below.<br><br>Consultation - The consultation process has not been transparent. It is only through the efforts of my local councillors that I have been made aware of this enormous undertaking. This is not acceptable. For something of this scale and impact on the local environment then a full and proper consultation must be undertaken,<br><br>Environmental Impact - I am extremely worried by the impact on Langstone Harbour and the Solent by this proposed development. Please can I have some details on the risk assessments and impact analysis that has been conducted on building and then operating a reverse osmosis plant on the proposed site.<br><br>Alternatives - The harbour is already under stress and I have seen other proposals that are far less costly and with less risk that can provide alternative solutions for all stakeholders. An independent analysis of the options and risks is a must for local stakeholders. It is not acceptable that Southern Water can ram through their favoured solution without consultation or assessment of alternative solutions like a leak repair programme or environmentally friendly excess rainwater storage facilities. I would like some level of assurance that these kinds of solutions have been discussed.<br><br>Please remove the lack of transparency so there can be a proper debate. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation.<br><br>All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information.<br>We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below:<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>With regard to Langstone Harbour, A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

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| | | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding alternative plans, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>Our regulators the Environmnet Agency (EA), Ofwat, the Drinking Water Inspectorate (DWI) and the Consumer Council for Water (CCW) are independent from Southern Water and they undertake an analysis of our plan along with advice from other bodies such as Natural England (NE). Their analysis looks at all aspects of the plan, including the options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it. The options and risks are assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process.<br><br>Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can. |
| WRMP781 | I am writing to you in regard to Southern Water's proposed water recycling schemes.<br><br>I am at a loss to understand why such a scheme is being pursued in a country with our climate, there is much talk in the media (especially social) that these schemes are used in many places. That is simply not true, they are used in few places with challenging climates and often just for | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket, supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Water from the water recycling plant will be used all year round to supply Southern Water customers, |

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| | agricultural / industrial use and not drinking water. In places such as Singapore (challenged more on land mass) there has been a huge shift towards bottled water and the environment issues caused by the increase in plastics usage.<br><br>In the UK we collect less that 1% of our abundant rainfall, surely it makes more sense to look at capturing and storing this. I originally supported the reservoir in Hampshire for this reason. Although it would have some environmental impact it was also necessary. There are also options of storing in underground aquifers. Both far more environmentally sound than running a recycling scheme all year (the documentation is clear this cannot just be used in summer months).<br><br>Southern Water lose as much to leakage as is likely needed in the future, far more priority should be placed on fixing these, figures show the loss of 100 million litres of drinking water every day!!<br><br>I live on the south coast, Southern Water cannot be trusted with waste water, there is much to point to pumping of sewage into the sea outside of that they admit to (which is already way outside just for emergencies as covered by the guidelines for release). Why would we possibly trust then not to make mistakes with drinking water which would be catastrophic.<br><br>I realise that there are concerns on the abstraction today, but they could be moved to closer to the tidal limit thus not impacting the chalk streams (again I live right next to one impacted by Portsmouth Water). Doing this in combination with bolder storage options would be far less environmentally damaging. The energy alone to transfer water across the county in a time where climate emergency has been declared seems ludicrous.<br><br>How can this possibly be allowed to go ahead unchallenged, reports point to it being the most damaging and potentially expensive option. | following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction |

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| | | licences on the whole river and groundwater system and because of the impact on migratory fish. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |
| WRMP782 | I find it surprising and concerning that I only learned about the Public consultation from a leaflet sent out by the Green Party and not through a more general information outlet - eg my local MP!<br><br>I truly believe that the Water companies should not be private companies but under Government control, maybe then they would spend more money on clean water production and less paying investors and speculators.<br><br>Southern Water's lack of action on fixing leaks and their proposal to use recycled sewage effluent from Budd's Farm to top up our water supply are objectional to say the least and must be abandoned.<br><br>Finally fixing leaks should be an immediate priority not a long term proposal. | Thank you for reviewing our rdWRMP24 and providing feedback. We have received 1176 responses as part of rdWRMP24 consultation.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>We note your objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP783 | 1. I do not think that Southern Water's Plan to develop effluent recycling as an alternative water source is an appropriate drought solution. There are other more sustainable options that could protect chalk streams such as the Itchen and the Test. (a) Abstraction sites on rivers could be moved closer to tidal limits. (b)Fix leaking infrastructure. (c)Universal usage meters – the more you use the more you pay. (d)Introduce compulsory grey water harvesting schemes on new housing developments.<br><br>2. Southern Water's Plan emphasises the need to adapt to the possibility of severe droughts while not taking sufficient account of severe heavy rain events, also predicted by scientists. The Plan should focus on maximising opportunities to capture and store this free resource for use during droughts, which will also reduce flooding risks. Use sealed aquifers to store excessive rainfall events. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>a) 1. We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can |

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| | 3. I am opposed to the Hampshire Water Transfer and Water Recycling Project because of its high financial, energy/carbon, chemical and environmental cost. For the cost of this scheme you could build three HTR sized reservoirs to store winter rainfall, which could last for 200 years and have low operational costs. The recycling project is contrary to Southern Water's commitment to achieve net zero carbon by 2030. The operation of the reverse osmosis plant and pumping water 40 km from Havant Thicket Reservoir to [redacted] will result in excessive carbon costs and greenhouse gas emissions. The nature of the reverse osmosis process means that it is not fit for purpose as a drought resource. The process must be run continuously, in Havant's case producing a minimum of 30 Ml/day of water, 365 days per year as its minimum flow to avoid damage to the membranes, pipes and pumps. It cannot be switched off when not needed. The Havant effluent recycling scheme is among Southern Water options with the highest negative environmental impact.<br><br>4. The Reverse Osmosis treatment process is very complex, requiring very close management and monitoring by highly trained and competent operators, a fairly consistent treatment stream, and a lot of maintenance which is expensive. However Southern Water locally has a poor track record with coastal discharges, poor maintenance, telemetry failures, and £92 million in recent fines. We do not trust this company to run this technology safely. People are particularly concerned about the use of Havant Thicket Reservoir as an 'environmental buffer lake'. Thousands of people in the Portsmouth Water area will be drinking the mixed spring and recycled water during an emergency or a drought. From 2040 this will also include parts of West Sussex. All could be placed at risk if any chemical or organic contaminants got through the recycling process and into the reservoir. The results from the trial recycling plant in 2023 raise concern, with bacteria in output water and low sampling rates for pesticides, pharmaceuticals and trace organics. That Southern Water will also be in sole charge of testing water quality from the recycling plant before it enters the reservoir, does not re-assure us.<br><br>5. I am particularly concerned about the plan to locate the recycling plant on a contaminated landfill site at Broadmarsh, Havant. This is known to contain solvents, hydrocarbons and asbestos among other toxic materials. The site is next to Langstone Harbour, a Ramsar wetland of international importance with SSSI and SAC conservation status. There are significant risks to this habitat, because the plant will require deep piling and tunnelling through the landfill to the chalk aquifer below, likely to release toxic leachate into the Harbour. There are safer and more suitable sites for the plant which avoid this unacceptable environmental risk.<br><br>6. If recycling effluent must be progressed, [redacted] Waste Water Treatment Works, near Fareham, would be a better location. This was considered by Southern Water but shelved. It would have the advantage of having space for the effluent recycling plant away from the coast, reducing environmental risks. Although it would require an environmental buffer lake to be built, it would also be a more sustainable solution as the plant would be closer to where the water is actually needed in Southampton and Winchester. | realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030. We are working on several pilots funded by our water efficiency fund looking at how rainwater capture can be used for both irrigation and toilet flushing. This is an option that can be considered for new builds.<br><br>2. With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>3. We note the objection to the use of recycled water in Havant Thicket. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>4. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. |

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| | 7. Tankering water from Norway which is suggested as a temporary drought solution if needed before recycled effluent comes on line in 2035 is a ridiculous idea. This would come at excessive cost and high environmental risk. Norwegian water is chemically very different from water in the Test and might introduce non-native organisms.<br><br>8. Investigation into greener lower cost schemes and their development should be started as soon as possible. Only when these schemes have come into operation, and their water yield known, should there be consideration of whether very expensive effluent recycling projects are needed as an additional resource. A delay might also allow time for technology to progress, perhaps enabling a water purification system which can be switched on and off when needed.<br>9. Defra should change the water industry funding mechanism to stop incentivising infrastructure heavy solutions which have to be paid for by customers. On top of which customers must pay to service the huge debt that will be associated with Southern Water's Plan. Instead Defra should incentivise the development of cheaper sustainable solutions that work with climate change.<br><br>10. When Southern Water made a material change their plan, from desalination to effluent recycling, they did not carry out a full review of all of the alternative options, nor did they undertake a statutory consultation. This is not acceptable.<br><br>11. Where recycled effluent has been introduced in other countries for drinking water there has been an increase in people drinking bottled water, resulting in a plastics mountain. | 5. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>6. Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. Should it be necessary to switch to this back-up option, we would need to undertake significant scheme development activity, which would include further studies and investigations including further site selection activity, as well as further rounds of public consultation.<br><br>7. With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>8. Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the |

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| | | resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>9. With regard to funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>10. With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. For more information, see here: https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>11. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP798 | please prevent southern water from proceeding with this hyenas crime.<br>we all have the right to clean purified water and not re cycled water.<br>southern water should be condemned for not treating effluent properly and this is just another debacle to cover up their failings.<br>building to new reservoir in this locality to supply water to another county is just improper practics.<br>before long we will all be drinking brown water " look at what happened in pre victorian times "<br>do we really need more contaminates or deseses at this time. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. |

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| | this new thought should be prevented vigorously. | Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website, https://dwi.gov.uk/water-recycling/. |
| WRMP799 | I strongly disagree with the whole idea of retreating sewage .<br>It won't affect me as I am too old but worry about the next generation.<br>Make better use of rainfall. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Regarding rainwater capture, we have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Our current plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). |
| WRMP800 | Major concerns regarding the proposed plan by Southern Water. I do not agree to used recycled effluent from [redacted] to top up our water supply.<br><br>Go back to basics, fix the leaks and collect our rainfall. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP801 | , Re Southern Water's plans to recycle effluent through a reservoir in Havant Thicket | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | When I moved here, in 1961, Portsmouth Water had plans to make a reservoir in the area: they never found it necessary to implement them, despite the increase in population. Our vast regional aquifer has always been sufficient to supply our needs. The recent changes to local rainfall, no doubt a result of global warming, make it likely that supplies will be adequate for the foreseeable future. This development is fairly recent, so Southern Water's plans for a storage reservoir seemed quite reasonable. What is not reasonable is that they propose to store recycled effluent there, the only reason for this apparently being to make a profit by selling it.<br><br>To most people the idea that profit should be made from the provision of water is repugnant; it would be interesting to now just how much money has been paid out by the company in dividends and bonuses since it was formed, money which would have been better invested in renewal of the infrastructure and investment to provide for the increased demand for sewerage facilities.<br><br>I do not intend to itemise all the objections to this plan; many people have, no doubt, covered them adequately,<br><br>I do wish to register that I object very strongly to a proposal which seems to be aimed, not at the public good, but at private profit. | We note the objection to the use of recycled water in Havant Thicket.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP802 | I am writing to respond to the conultation on the Southern Water revised draft WRMP.<br>• Measures to reduce water use and mend leaks are clearly good.<br>• Desalination makes environmental sense for a water company with a long coast-line available for sea water, especially with advancing desalination technology.<br>• Water recycling is the most environmentally sound method of all.<br>• Making use of local reservoirs to transfer water in the local area and reduce strain on vulnerable waterways seems sensible.<br>• T2ST: the creation of a long and expensive pipeline to transfer water from the Thames Valley to the coast seems completely mad for the following reasons:<br>- This transfer would take water from the most highly water-stressed area in the South East to an area with plenty of sea water available for desalination.<br>- This transfer would depend on the construction of a giant reservoir (SESRO) that may never happen<br>- the project would be extremely expensive since Southern Water would be tangled up in the funding and construction of bothe the reservoir and the pipeline.<br>- Southern Water would be enmeshed in partnership with Thames Water which has appeared to be on the brink of collapse for months.<br><br>Why has Southern Water allowed itself to be embroiled in this unlikely plan when so many other (sensible) means are available to it? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>• Your comment has been noted, and we thank you for your support.<br>• Our plan includes a number of desalination plants in our Eastern area.<br>• Your comment has been noted, and we thank you for your support.<br>• Your comment has been noted, and we thank you for our support.<br>• T2ST is considered to be in accordance with the National Framework and Regional Plan requirements, in that T2ST forms part of a portfolio of supply side strategic options identified as being required in the WRSE draft Regional Plan. The National Framework supports this approach, recognising that substantial new supply infrastructure will be required.<br>- SESRO is being jointly developed by Thames Water, Affinity Water and Southern Water as a regional solution. However, for the purpose of WRMP24s, it is included in Thames Water's WRMP24. Sensitivity analyses were carried out by using different sizes of SESRO as well as excluding SESRO altogether. The results show that if SESRO cannot be built, it will need to be replaced by a large transfer from Severn Trent Water to Thames Water or another reservoir. For further details, see Section 10 of Thames Water's WRMP24 https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/wrmp24/technical-report/programme-appraisal.pdf |

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| | | The regional modelling carried out to support this WRMP shows that in the scenarios modelled, customer supplies cannot be met until 2034 without using drought options in Hampshire. The scenarios included in our rdWRMP24 are that abstraction during droughts from the Test and Itchen should not continue beyond this date. This is a fixed assumption in the regional investment model and schemes such as HWTWRP and the T2ST are selected as the best value options for continuing to meet demands in this scenario. Although these schemes are expensive there are no other environmentally sustainable, lower cost options that can meet water supplies needed in Hampshire. |
| WRMP803 | Dear Sirs<br><br>I wrote previously in response to the consultation document in July 2024.<br><br>I am surprised to read in this latest WRMP 2024 plan that there has been very little if any progress on the feasibility of the cheaper options proposed.<br><br>This plan seems committed to the most expensive and environmental damaging options.<br><br>Leaks in the infrastructure are currently at about 100million litres a day which is five times the output planned from the reservoir. The target of 53% less leakage by 2050 is pitiful.<br><br>There is little commitment to riving down demand for water with the compulsory installation of water meters.<br><br>Why is no effort being made from the predicted climate change of wetter winters and dryer summers. Could the storage of this water not be considered. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP805 | Dear Sirs<br><br>Havant Thicket Reservoir<br><br>When the proposal to construct a reservoir was first tabled, it was made to look as if this was Portsmouth Water Company creating a storage facility for one of our most precious needs—Fresh Drinking Water. That was my understanding and we indicated out support for the proposal. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |

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| | We now find that the proposal originates from Southern Water—a company notorious for contaminating our local streams and harbours, and it isn't to store drinking water,but semi-treated sewage effluent.<br><br>We are ashamed that we were so easily persuaded as to the merits of the scheme, and wish to withdraw our support, indeed we are totally opposed to what is now proposed, and are astonished that our Council appear to support it.<br>We are fortunate to have a plentiful supply of clean water, and are let down by the organisation paid to treat and purify the contamination caused by our domestic lifestyle. Other areas are affected by heavy industrial usage and exotic chemical contamination, but we do not have that problem and should be able to lead an ordinary existence without feeling guilty. | The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We note your objection to the use of recycled water in Havant Thicket. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of 'serious water stress', see here. |
| WRMP806 | I wish to express my disapproval of Southern Water's Water Resources Management Plan, and ask that you reject it, for the following reasons:<br><br>There is no need to recycle treated waste water when this part of the country has adequate rainwater (despite the gloomy forecasts of global warming, which at the moment is resulting in more winter rains). Recycling of waste water has high overhead costs, and, if badly managed, can lead to much more expensive mitigation processes.<br><br>At present, large volumes of clean water are lost through leakage in a poorly maintained and updated distribution network. It would be better to improve the pipes, rather than using inferior quality water to make up the required needs.<br><br>The extraction of river and borehole water should be rethought, so that the maximum amount can be extracted - the further away from the sea, coast and population the water extraction and storage are, the more water 'escapes' into the sea, or has to be transferred to where it is needed.<br><br>There are other reasons, but these are serious enough .<br><br>PLEASE reject the Management Plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of 'serious water stress', see here. We note your objection to the use of recycled water in Havant Thicket however, supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP809 | I strongly object to the 'revised 'plan….the southern water company cannot even be trusted not to pollute our waterways, let alone a valuable reservoir. It stupidly sold off its own reservoirs, so is the architect of its own demise. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP810 | I wish to object most strongly to this revised Draft Water plan by Southern Water and ask that Defra reject it.<br>It is clear to me that the plan fails the 'common-sense' test on so many dimensions that it should be rejected forthwith. The short-comings of the plan are too numerous to mention them all but for me the key ones are:-<br>1. Mixing effluent with drinking water should be a last resort rather than a first.<br>2. Not making the most of capturing and storing rainwater is a major omission from any strategic plan.<br>3. The plan involves continuous pumping of many millions of litres of effluent/water over many kilometres and as such is energy hungry and environmentally unfriendly.<br>4. The plan does not prioritise reducing leakage and usage as fully or as quickly as it should.<br>5. The strategy should be to make more use of assets like the new Havant Reservoir or natural aquifers. Instead, I have it on good authority, that the planned mixing of effluent into the Havant Reservoir will result in algae growing there and undermining the leisure usage that was a key component of it's initial justification.<br>6. I recognise that any solution will be hugely costly but it appears to me that the planned expenditure is being misdirected and so will result in a HUGE mistake which our children and grandchildren will have to bear the brunt of and also rectify. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society.<br><br>2. Regarding rainwater storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>3. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>4. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. With regard to possible algal blooms, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir |

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| | | and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. The water recycling proposals are not expected to impact the proposed recreational use of the reservoir.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. |
| WRMP811 | I am deeply concerned about Southern Water's water resources management plan and am writing to express my opposition to it.<br>I believe this plan, which does not focus on developing the most sustainable solution for the collection and storage of rainfall, in the context of climate change, is simply a poor and expensive proposal. I have a number of main issues with the plan.<br>1. Rainfall is free and we should work out how to harvest it and store it. Additionally, a major problem with the performance of our water companies is their failure to tackle leakage reduction: instead of plans like this one, this should be a priority, and more effective leakage reduction would contribute to our water supply needs.<br>2. I do not wish to drink recycled effluent, when rain water is freely available, if properly managed. Furthermore, how can we be assured that this will be manged safely, when Southern Water's track record of pollution incidents is so lamentably poor on this. Southern Water needs to build our trust that our water is safe to drink; this plan will further erode public confidence in our water supply and in the safely of our rivers and harbours.<br>3. I am concerned at the huge cost of building and maintaining such a massive infrastructure as that proposed. I believe that there are perverse incentives operating here, which reward companies like Southern Water for such building projects, rather than incentivising lower cost sustainable solutions.<br>4. The environmental impact of this plan is negative and the siting of the recycling plant so close to Langstone Harbour must be a major concern.<br><br>To conclude I do not support this plan and urge you to reject it and to require Southern water to develop a more sustainable plan which shows a proper concern for the environment, and works with climate change, rather than a hugely costly plan which has a massive carbon footprint with a high risk to the environment.<br>Yours sincerely | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit. Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society<br><br>1. Regarding rainwater storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>2. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will |

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| | | continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>3. The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br>4. We note your objection to the use of recycled water in Havant Thicket. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net |

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| | | Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |
| WRMP812 | As a resident of Portsmouth I am shocked that Southern water are allowed to even contemplate using a reverse osmosis recycling plant for the population. When they only use 1% of rain water and lose 100 million litres of treated drinking water a day because of lack of maintenance and upgrades. I'm appalled and think they are purely going down this route for profit ( 45 million) . With climate change, rising river levels and also increased rainfall, surely it would be more eco friendly and cheaper to increase reservoirs and storage .To upgrade the current pipe and drainage would be not before time ! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. |
| WRMP813 | I do not want my family to be drinking recycled sewage water!! Would you yours?<br>I live very close to one of Southern Waters treatment plants. We have had flooding and days where the smell has been so bad we have been unable to be in our garden. What hope do Southern Water have of correctly managing the new proposed Water Management Plan if they cannot look after the treatment plants and pumping stations they have now?<br>With the changing climate we can expect more and more rain. Currently Southern Water only utilise 1% of rain water and still manage to lose 19% ie 100 million litres a day through leaks etc.<br>The rejected water from the new plant is apparently going to be pumped into the Solent and will be 4 times stronger than the sewage currently discharged into the sea in this area. You cannot | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |

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| | swim safely without passing faeces as it is. Very nearby is Langstone Harbour and Farlington Marshes which are beautiful natural areas for all sorts of wildlife.<br>I truly believe that this whole Plan is monetary based with Southern Water making a profit of 45 million pounds which will basically come from its customers bills.<br>Please consider rejecting this plan and making Southern Water come up with a plan that will work with climate change and be kinder to the environment. | We note your comments regarding odour in the area near Portsmouth Harbour WTW. As this consultation is for our Water Resources Management Plan which covers our plan for provision of drinking water, we are unable to comment. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates.<br><br>We note your objection and environmental concerns supplementing recycled water in Havant Thicket. A consultation on the water quality impacts in the reservoir and the Solent as part of our ongoing Environmental Impact Assessment will be held in 2025.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit. Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the |

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| | | future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society |
| WRMP814 | It is essential that DEFRA do not support the proposal by Southern Water to use Havant Thicket to hold recycled water. The original consultation by Portsmouth Water stated that the site was for spring water . Scrutiny of SWA plans reveals many flaws and my objections are as follows:<br><br>The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers. (For further detail refer to item A below).<br>2<br>SW have not completed a full review of the plan considering all alternative options as “a full re-appraisal exercise was not considered time or cost beneficial” (Annex 20, page 3). Given the importance of finding immediate solutions for the rivers Test and Itchen and at Pulborough, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. More sustainable options previously ‘parked’ by SW which work with predicted climate changes should have been more robustly assessed and included in the revised draft plan.<br><br>3<br>It is clear that SW have only focused on identifying options to fill the gap as a result of the delay to recycling options in Hampshire and at Littlehampton (Annex 20, page 1 and 3) instead of seriously looking at prioritising more sustainable options.<br><br>4<br>The timescales for 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 precious and iconic chalk rivers with no solution for longer.<br>5 | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>2) Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>3) The purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard.<br><br>4) With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034. |

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| | 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. (For more detail refer to item B below.)<br>6<br>SW should not be allowed to rely on continued use of the Candover drought option, Lower Itchen and Test drought orders, while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered as proposed (Annex 20, page 1 and 2), as it is inevitable that the Hampshire recycling scheme will be delayed further and will not be available in 2035, a more sustainable solution must be developed.<br>7<br>Tankering water from Norway in a drought cannot be accepted as a credible drought plan. (For more detail refer to item C below).<br>8<br>SW are unnecessarily pessimistic in their assumptions regarding population growth and this is driving a large demand deficit. The information provided is also contradictory with Annex 7b forecasting 23% growth and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible. (For more detail refer to item D below.)<br><br>9<br>Assuming high levels of abstraction reform is over precautionary when what will be required in future is currently very uncertain as SW environmental studies are still ongoing. This is driving a large demand deficit which helps SW justify their unsustainable effluent recycling schemes. (For more detail refer to item D below.)<br>Assuming no abstraction at all even in winter from the rivers Itchen and Rother is not appropriate and over precautionary. (For more detail refer to item E below.)<br><br>10<br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control.<br>An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050, rather than the 53%leakage reduction target they have set themselves by 2050. | 5, 6) It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>7) With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>8) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>9) The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies. |

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| | Government figures indicate that Southern Water lose a further 3.2% of the water they take from the environment before it even reaches a treatment works. This shows a complete disregard by the company for just how precious water is.<br>11<br>SW have not taken account of the completion of the Hampshire Grid improvement programme which 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 within Hampshire 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 in the Western Area supply area by 2030 should have been fully considered and taken into account in the plan.<br>(For more detail refer to item F below.)<br>12<br>The investment model is not fit for purpose it needs to be urgently revised 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, whereas it currently favours large infrastructure schemes which should be a last resort once more sustainable options have been exhausted. (For more detail refer to items K and L below.)<br>13<br>The possibility of market trading for 'water credits' is mentioned. This is a concern as it could create a new loophole for water companies and speculative developers to exploit to make money, while not actually doing anything to fix the problems faced.<br><br>14<br>Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers. In fact, the restricted documents confirm that the Hampshire effluent recycling/ transfer scheme is almost as expensive to operate (OPEX) per megalitre as tankering water in from Norway!<br>15<br>The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. In fact, the restricted documents confirmed that the Hampshire effluent recycling/ transfer scheme has a higher total carbon, average carbon emissions & embedded carbon impact than sea tankering water in from Norway! (For more detail refer to item M below.)<br>16 | 10) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>11) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>12) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>13) Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings.<br>Affinity Water are investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br><br>14) Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in |

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| | SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br>17<br>The process of environmental assessment and screening methodology cannot be robust if unsustainable and environmentally damaging schemes like the Hampshire effluent recycling/transfer scheme get through. In fact, the Strategic Environmental Assessment confirmed that the Littlehampton Effluent Recycling scheme and Hampshire effluent recycling scheme had the highest negative impact scores, yet both of these options were selected by Southern Water.<br>18<br>This is a short-sighted water resource plan, customers will still be paying for the effluent recycling infrastructure after it has become redundant due to the Ofwat funding mechanism. With the recycling plants expected to last just 60 years, the huge cost of constructing these schemes cannot be justified, especially as these options leave no tangible legacy for the future. The Hampshire effluent recycling / transfer scheme alone will cost at least £1.2 billion. Customers will also have to pay for the eye-watering debt generated well into the future. For more information on the key concerns and environmental impacts associated with the Hampshire effluent recycling scheme via Havant Thicket Reservoir please refer to 'Effluent Recycling – the 15 Key Concerns'.<br>Concerning option selection<br>19<br>Moving the [redacted] abstraction to the tidal limit would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. This is not mentioned as an option that has been considered in the SW Technical Report, nor Annex 20. (For more detail refer to item E below)<br>20<br>In the future SW indicate 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. Moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows in rivers to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. (Why is the solution of moving abstractions to the lower catchment of rivers not being prioritised for investigation as a more sustainable solution across the region?)<br>21<br>More challenging targets must be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control. Investigation and delivery should commence in 2025 to ensure these schemes are delivered as quickly as possible, to provide at least 13.8 Ml/d to help better manage resources in the catchments and protect the rivers Test and Itchen from drought orders. We need Defra and the regulators to strongly challenge on this to ensure a quicker delivery date. (For more detail refer to item H below.)<br>22 | Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>15) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>16) A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>17) We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact.<br><br>18) The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>19, 20) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. This is essential and should be prioritised and funded urgently so that these schemes can be included as feasible options. Aquifer storage has been successfully used for many years across the world, including in California and in the Thames Basin (UK). Tests in Dorset have previously shown that aquifer storage and recovery is feasible in confined sections of the chalk.<br>(For more detail refer to item G below.)<br>23<br>Proposed schemes to recycle water currently wasted at the [redacted] and Test Surface Water WSW should be prioritised more urgently to help minimise abstraction on the Test and Itchen all the time, not only in a drought (Annex 20, page 32).<br>24<br>No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme. A scheme previously indicated to be feasible with sites that are closer to where the water is needed. (For more detail refer to item J below.)<br>25<br>Negotiations with a very large industrial water user in South Hampshire should have been brought forward as a priority, to explore alternative supply options when the contract expires in 2026, to free up drinking water for SW customers in a drought (Annex 20, page 6) and provide more certainty for the plan.<br>Could a desalination plant that trials research into alternative technology, potential uses for the hyper saline solution and reducing energy consumption be a way forward for this site (Annex 20, page 30 refers) perhaps in partnership with industry.<br>26<br>In West Sussex the need for network upgrades is being used as an excuse not to bring forward schemes at existing works that would increase supply (Annex 20, Appendix A). If all of these schemes rejected for this reason were brought forward, they could deliver more than 20Ml/d of water to the Central Region. This is more water than is to be provided by the proposed Littlehampton (Ford) effluent recycling scheme which will discharge to the Western Rother. The necessary network upgrades in West Sussex should form part of the plan. Network upgrades are taking place in Hampshire to address such concerns, why not in West Sussex?<br>27<br>Across the Western and 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 18 Ml/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 | 21) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>22) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>23) With regard to prioritisation of recycling water at Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. These would be considered for WRMP29.<br><br>24) We are focussed on delivering the HWTWRP by 2033-34. The alternative option to use Fareham for recycling water has not been shelved but is put on hold.<br><br>25) We will be exploring the option of amending the bulk supply agreement with a large industrial user in HSW WRZ when the existing contract expires in 2026. However, we are not planning to consider any changes to the bulk supply agreement for WRMP24.<br><br>26) Network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29. |

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| | water sources in a more sustainable way that works with climate change, not just use the cheapest sources first.<br>28<br>Multiple cheaper and more sustainable schemes have been rejected by SW because they 'cannot be delivered in time' (presumably this means by 2030).<br>17 schemes in Hampshire and IOW (Western Area) could deliver at least 42 Ml/d.<br>7 schemes in West Sussex (Central Area) could deliver at least 18 Ml/d<br>Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are putting all of their 'eggs in one basket'. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>29<br>SW are still not urgently investigating and bringing forward additional new reservoir schemes in the short to medium term, despite this being customers preferred choice. The delivery of the River Adur project is not scheduled until 2039/40, no other reservoir schemes are in the pipeline in Hampshire or West Sussex in the revised draft plan.<br>30<br>Groundwater schemes on the Isle of Wight (IOW) are not brought forward as the water gained cannot be transferred to the mainland to help the rivers Test and Itchen in a drought (Annex 20, page 5-6). However, if implemented they would reduce the amount of water that needs to be transferred from Southampton to the IOW providing a benefit that should be pursued.<br>31<br>The timescale for delivery of ten years should not be seen as a valid reason to reject provision of a bi-directional link between the IOW and the mainland, especially as it could allow water to be used more flexibly in a drought, including use of future spare water from Sandown.<br>32<br>There has been little proactive work by SW to investigate buying or trading licences with private supply users across the region. In a restricted document supporting the previous draft plan it indicated buying just one licence could deliver 19.7 Ml/d. There should be more proactive investigation and negotiation by SW to buy existing private abstraction licences, this in turn would then open up the potential for a more flexible approach to the use of licences within a catchment to meet water supply needs and environmental objectives.<br>33<br>Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to fix leaks, save water and reduce their use of drinking water for non-potable uses. Southern Water pilots have already demonstrated that great reductions can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions. Yet their targets for improvement in the first 10 years of the plan are woeful, with no benefit by 2030, and hardly any by 2035 (Annex 14, Table 15).<br>34<br>The free water butt scheme trialled on the IOW should be rolled out across the SW supply area to customers as a priority. | 27) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences, which typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods.<br><br>28) Notwithstanding the fact that these 17 schemes are not explicitly identified in this query, there is little benefit in developing 17 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030.<br><br>29) We have looked at over 50 reservoir options as part of our options appraisal process over the last 3 WRMP cycles. These are not taken forward due to environmental concerns that will make it difficult to get planning permission. However, we review these options for each WRMP cycle and will review them again for WRMP29.<br><br>30) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>31) The delivery time of an option is the reason for rejection only in cases where water is needed earlier than the option can be delivered. The delivery time in itself is not a reason for rejecting an option.<br><br>32) We are open to licence trading. The Sittingbourne industrial re-use scheme in our Kent area is effectively a licence trading scheme that will provide up to 8Ml/d from 2030-31 onward. |

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| | 35<br>To read about a strategy for a better way forward please refer to the Water Matters page on 'A better way forward' at this link.<br>Concerning inadequate consultation with water users and affected communities | 33) Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency. |
| | 36<br>Critical documents 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. In fact there are more documents restricted in 2024, than there were in 2022. Is this a deliberate play 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. Other water companies made this information more accessible. | 34) Regarding water butts, following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>35) Noted<br><br>36) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/ |
| | 37<br>Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling? | 37) We consulted extensively with our customers and stakeholder before publishing our dWRMP24 and solicited their views on the different option types. However, we have a statutory duty to maintain uninterrupted supply of water in all but the most extreme weather conditions, which may mean selecting options less preferred by customers. |
| | 38<br>Assurances given by SW that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met. | 38) The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. |
| | 39<br>Lack of adequate and meaningful engagement /consultation with customers;<br>– A very significant alteration is taking place to customer's water supply with the source changing from river, spring or groundwater to recycled effluent. SW should be proactively engaging with all their customers to get their feedback on this material change. | |

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| | – 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 the [redacted] desalination scheme was rejected, and the WRMP19 back-up option of discharging recycled effluent to the River Itchen was also 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 a full public consultation. This did not happen.<br><br>– As a result, 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.<br><br>– At the time of previous consultations (2020 to 2022) posters were not even placed at 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.<br><br>40<br>The consultation documents are vast, very repetitive and fail to provide important information, or make it restricted and inaccessible, making it very difficult for a lay person to understand/get through the consultation reports. Is this intentional?<br>Since this is a 'once-in-a-generation' chance to address future water needs, there needs to be a more open discussion about moving to a more sustainable approach which works with predicted climate change, not against it.<br>Further Detail<br>More detail on some of these concerns is set out below with page numbers provided to help find the relevant detail in the SW consultation Technical Report.<br>A<br>The SW revised draft plan does not strive to work with predicted changes to our climate, which modelling has shown means we will get wetter winters and drier summers. We need a complete re-think about how, where and when we take water from the environment.<br><br>We need a strategy that includes;<br>• Moving abstractions (river and boreholes) to the bottom of the catchments, | We made clear in our Summer 2024 Consultation for the Hampshire Water Transfer and Water Recycling Project that water quality modelling and assessment work was ongoing and would be fully reported in our Development Consent Order application. As that work has progressed, we are now consulting on it as part of our Spring 2025 Consultation.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order application. The energy usage information used to support that will be appended to the assessment.<br><br>39) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/ |

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| | • Collecting more water in winter and storing it for use in dry summers.<br>This would reduce environmental impacts and allow the extent to which abstraction reform is required to be reduced.<br>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 chemical, energy and carbon hungry infrastructure (effluent recycling and desalination), which must operate 24 hours a day, 365 days a year, even though it is intended as a drought resource. Constructing large pipelines to transfer the water long distances (40+km), because the water is not being manufactured 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 invest in infrastructure heavy unsustainable solutions, which once selected will stop the Company investigating and bringing forward more sustainable solutions for another generation. We agree urgent action is needed now to invest to create more robust and resilient water supplies, but what is needed are more sustainable solutions that work with climate change, not against it.<br>• Moving river and borehole abstractions down catchment to protect the environment and restore more natural flows.<br>• Developing new reservoirs and aquifer storage schemes enable more winter water to be stored for use in dry summers.<br>SW say this is a once in a generation opportunity to develop more resilient supplies, but we need to take action now to make the right decisions to invest in more sustainable solutions that leave a long-term and positive legacy, not chose unsustainable solutions to manufacture water, which SW see as a quick fix and which makes them a profit, but future generations will regret as they will last no more than 60 years!<br>B<br>The SW proposal to continue to rely on and extend the use of the Candover Drought Option (augmentation boreholes) and drought permits (page 138-139) should not be permitted beyond 2030. Instead SW should be required to move the [redacted] river abstraction to the tidal limit to allow natural flow to be restored in the freshwater catchment during a drought, bring forward their groundwater borehole schemes in Hampshire sooner, plus actively investigate and bring forward additional aquifer storage options. SW should not be allowed to continue to use these 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. Having failed to understand the risks of the [redacted] 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 new technology 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.<br>C<br>It is unbelievable that in Hampshire SW now propose to tanker water from Norway in a drought instead of proactively investigating more sustainable solutions such as moving the [redacted] abstraction on the River Itchen to the tidal limit, or capturing more winter rain and storing it for | 40) We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan.<br><br>Sea tankering from Norway is no longer included in our plan. |

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| | dry summers. Tankering 45 Ml/d is equivalent to moving 18 Olympic size swimming pools of water every day. On page 136 of their revised draft plan SW acknowledge “considerable risks and uncertainties remain, especially around water quality and our ability to mitigate the identified environmental impacts linked to both tankering and transferring water from the port (Southampton) to Test WSW site via temporary pipeline”. On page 31 SW confirmed; “The Board acknowledges that the implementation of bulk import by sea tankers presents a number of deliverability challenges (which had previously resulted in it being rejected)”. A solution the GMB union (who represent water industry workers) described as “farcical and ridiculous”, noting that; “The UK uses just a tiny amount of the rain that falls from our skies. Private water companies have utterly failed to invest in the infrastructure needed to capture more and reduce the need for farcical plans like this”.<br>Tankering water from Norway cannot be accepted as a credible plan.<br>• The cost to customers will be enormous, including fixed annual costs and reservation charges even when the water is not required (Annex 20, Page 11).<br>• The environmental impact will be huge, in addition to the massive energy and carbon impacts, the temporary pipe would be placed “along the banks of the River Test” (Annex 20, Page 9). It is hard to believe that private landowners along the river will give their consent.<br>• There is a risk of importing non-native species to the River Test catchment when the water is stored at existing lakes alongside the river, or if the temporary transfer pipe from the port leaks or bursts.<br>• There are water quality issues as the water 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?<br>What will be the impact on fish and the wider river ecology?<br>D<br>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;<br>I. 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) population growth of 16%, the figures which most closely aligns with the core strategy in the Ofwat guidance (page 118).<br>Note: The information provided on population growth is also contradictory, using different time periods, with the Technical Report indicating a growth forecast of 23% by 2075 is used and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible? The regulators must seriously scrutinise the growth figures being used.<br>II. 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.<br>III. Assuming there will be no abstraction at all on the Rivers Itchen and 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 | |

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| | lower River Rother and River Arun to remove any potential risk to designated wetlands, going beyond the required reductions just to meet flow targets".<br>IV. Used 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).<br>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 more sustainable solutions to meet immediate needs in the interim. More pessimistic forecasts should only be used when they become more certain.<br>Note: Ofwat previously indicated that effluent recycling at the smaller volumes originally proposed by SW was not cost effective. By driving up the forecast demand SW are trying to justify a greater need and thus a requirement for a larger plant. The costs then go up and perversely SW make this very expensive infrastructure more acceptable to Ofwat (the water industry financial regulator).<br>E<br>Assuming no abstraction at all from the Rivers Itchen and Rother (page 107) is not appropriate and makes no sense.<br>• Water can be abstracted in winter with no significant adverse impact, and abstraction can help to reduce flood risk.<br>• The abstraction can be moved to the tidal limit to protect the whole of the freshwater catchment, while complying with Water Framework Directive Guidance for transitional waters (estuaries). This would be extremely beneficial in a drought, restoring the natural freshwater flow of the river for the benefit of the ecology and geomorphology. This would require minimal new infrastructure compared to the high infrastructure solutions being proposed by SW and would be much cheaper for customers. In Annex 5 (page 37/38) SW indicate "we intend to investigate this option further for the revised draft WRMP". However, this is not mentioned as an option in the Technical Report which supports the revised draft plan, nor in Annex 20 (Appendix A). In the restricted Option Appraisal this was deferred, not to be considered until WRMP29, why not now?<br>Note: If initially the current [redacted] 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.<br>F<br>Despite there being an ongoing Hampshire Grid scheme which will improve connectivity of the SW distribution network in Hampshire which was due to be delivered in 2028, SW have chosen to ignore these improvements and they have not reviewed or merged the boundaries of water supply zones in Hampshire for the revised draft plan period 2025 to 2050. SW have indicated they will not do this until they develop the 2029 WRMP (page 35), so the benefit of recently funded improvement programmes are not being taken into account in the current draft plan. As | |

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| | the Company option review and selection process is based on individual supply zones (page 118 and 132 confirm) including assessing whether there are sufficient options in each zone, and whether there is sufficient connectivity?, this may be adversely impacting the decisions being made for the Hampshire Zones, the volumes of water needed under different scenarios and the options being considered. The fact that zones are still broken down in Hampshire and assessed individually is likely to have disadvantaged more sustainable option selection. Taking into account the ongoing development of the Hampshire Grid could have changed the options appraisal process.<br>G<br>SW state on page 131 that the location of Aquifer Storage Recharge (ASR) options would be limited to locations with suitable geology. This is true for where the storage would actually take place, but rather implies SW may have been dismissive of these more sustainable options for this reason. There is no recognition that if the new 'Hampshire Grid' is operational (as it will be soon due to the ongoing improvement programme), and you take into account that water can be transferred into the SW Hampshire supply area through the Portsmouth Water network, this allows excess water to be collected in winter and stored in any suitable confined aquifers across almost anywhere in Hampshire and West Sussex, where SW have large supply shortfalls in a drought. SW have previously identified a number of aquifers across this area (including on the IOW) with the potential for aquifer storage, but not progressed them to the investigation stage, instead they 'parked' them for further consideration in 2029, wasting a further five years, when such schemes could play a key part in meeting short and medium term needs. This is an example of where there has not been the will to properly investigate more sustainable options, and where the decision not to rezone Hampshire for this latest revised draft WRMP assessment could have had a significant adverse effect on the option selection process. If a number of aquifer storage schemes were developed, each with a relatively small yield, this could make a significant difference to provide sustainable water sources in a drought, especially in the western area. Tests in Dorset have previously shown that aquifer storage and recovery is feasible in confined sections of the chalk.<br>H<br>We are pleased to note on page 25 (Technical Report and Annex 20 pages 5 and 6) that some groundwater schemes have been brought forward as the local community had advocated since 2022 including;<br>• Drilling new boreholes at Romsey to provide 4.8 Ml/d by 2030-31;<br>• Removing constraints at Kings Sombourne groundwater source to provide additional 2.5 Ml/d from 2030-31;<br>• Implementing Test Managed Aquifer Recharge scheme to provide up to 5.5 Ml/d from 2035-36.<br>However, given the very limited infrastructure required (see pages 164-165 and 169) regulators need to challenge why these new water resources cannot be brought on line sooner to provide 13.8 Ml/d to help better manage resources in the catchments and protect the Rivers Test and Itchen from drought orders.<br>While some environmental studies and trials will be needed a previous SW estimate for developing the Test MAR scheme was six years including the trials. The initial assessment was also that the yield could potentially be significantly higher. Two years have already been | |

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| | wasted. If work started immediately this drought resource could potentially be available by 2030. A more challenging target should be set for delivery of these schemes, especially as these options are completely within SW control and not dependent on other water company input.<br>The option to recommission Chilbolton near Andover was rejected as it only provides a small benefit (0.5 Ml/d) to one zone, but not the Test or Itchen (Annex 20, page 5). SW need to investigate if there is an option to better connect zones to enable this resource to be utilised as part of the Hampshire Grid project?<br>I<br>SW indicate that they have used costs (CAPEX and OPEX) from 2021 (page 134/135). For the Hampshire effluent recycling scheme the costs have spiralled since 2021, CAPEX and OPEX costs have gone up considerably since the Gate submission. The costs developed in 2020-21 are definitely out of date as costs have spiralled to a minimum of £1.2 billion. If the best value assessment of the option is based on 2021 costs it will be flawed.<br>• If the true costs of the effluent recycling scheme via Havant Thicket Reservoir were known in 2021/22 would the scheme have been selected as best value?<br>• In the light of the known minimum £1.2 billion price tag has the schemes selection been robustly reviewed? Regulators need to look at this carefully.<br>Reference is made on page 138 to additional costs included of £96.8 million for new treatment (ceramic membrane filtration system) at [redacted] to treat the recycled water.<br>– What additional treatment will be needed at Farlington WTW before supply of recycled water to Portsmouth Water customers, and has that been included in the costings?<br>J<br>No work is taking place to ensure the alternative effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced, even though SW received Ofwat funding to progress investigations. Page 137 confirms; “Earliest delivery delayed from 2030-31 to 2037-38 to allow additional time in case the preferred option cannot be progressed”. There is a concern that SW are manipulating the situation to ensure that at the Development Consent Order application stage for the Hampshire effluent recycling/ transfer scheme the Company will be able to argue there is no viable alternative available, in the timescales needed to meet the Company commitment to EA and NE for abstraction reductions on the Rivers Test and Itchen. Hoping that this will push the scheme through despite their being likely significant environmental effects. When effluent recycling from [redacted] WWTW could provide a source closer to where the water is needed, which is cheaper to operate and potentially has less environmental impacts.<br>K<br>SW indicate on Page 148; “ When making a decision about inclusion of an option, the Investment Model (IVM) used looks to see if it is economic to defer investment until after 2030 and only includes investment in the 2025-30 period if it is economic to do so once all the futures after the 2030 and 2035 branch points are considered”. This sounds like SW are deliberately manipulating the model to prevent the selection of smaller more sustainable schemes until after 2030, in favour of continued use of drought permits on the Test and Itchen, and the selection of larger schemes which cannot be delivered until later, to make sure the Company get the solution they want selected, which delivers more guaranteed profits. This is not acceptable we | |

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| | need the model to freely select and bring forward the development of smaller more sustainable local solutions now. If that pushes back the delivery timescale for when effluent recycling is needed that is a good thing, as it allows time for advances in more sustainable technology for effluent recycling and desalination to be developed.<br>Note: A report commissioned by SW indicated that the development of nanotechnology could be a game changer for the viability of desalination in the near future.<br>L<br>The Investment Model used prioritises continuing abstraction from rivers in a drought (options/ permits) over other solutions as that is cheaper, even when other options are available (page 154). The criteria the investment model is using are clearly flawed, relying on manual interventions to force more appropriate option selection in the early years of the plan, when SW chose to do so. This is likely to be one of the reasons why other more sustainable options have not been selected in the past.<br>• The regulators need to scrutinise the modelling carefully to ensure that sustainable solutions are not held back.<br>• The model should have been updated as a priority before the plan was revised, not after.<br>• Additional more sustainable options that have previously been 'parked' by SW and may not even make it to the investment modelling stage as potentially feasible options also need to be brought forward so that they can be selected for investigation. For example, moving abstractions to the tidal limit and aquifer storage options. If they are not selected in the plan they will never get funded to assess the yield they could provide. This then becomes a 'negative loop' where they cannot be selected because SW say they don't know what yield they could deliver. Without funding for investigation SW will continue to make the same excuses for not selecting these options in 2029. Without selection in the this plan the necessary investigations will not be funded.<br>M<br>Effluent recycling via Havant Thicket and transfer (40+km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions. Page 251 confirms that the individual scheme with the largest greenhouse gas impact is the bulk import from Havant Thicket Reservoir to [redacted]. SW estimate that emissions will be 898 ktCO2e (Figure 10.1), more than double that of any other transfer or desalination scheme. It is not even clear if that figure includes the emissions from the effluent treatment process. Page 252 acknowledges; "The water sector accounts for nearly 1% of UK greenhouse gas emissions and has an important role to play in tackling these ahead of the UK's 2050 target". Stating SW are; "Ensuring carbon is a key focus by instilling carbon conscious decision-making and processes into the Southern Water culture" If that were the case how is effluent recycling selected?<br>SW have committed to being net zero carbon by 2030, yet this energy and carbon hungry scheme is selected for 2035. There is no indication that SW are striving to plan in a sustainable way when this plan selects the highest carbon and green house gas emission options in the short term (tankering from Norway) and in the medium to long-term effluent recycling via Havant Thicket Reservoir with a 40+km transfer pipeline to [redacted], and later 32+km pipeline into West Sussex. | |

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| WRMP816 | I am a concerned resident of Emsworth in Havant Borough. I am a consumer of water provided by Portsmouth Water (PW) and water waste removed by Southern Water (SW). I have spent a lot of time researching solutions to the problems of supplying clean safe water to residents of Hampshire and Sussex in future. I am grateful to have the opportunity to offer the opinions below, grouped into four different sections.<br><br>I visited the site of the reservoir being constructed at Havant Thicket two years ago after attending a consultation on recycling water from effluent by SW at Havant Council Offices. I also paid a personal visit to explore the proposed recycling site at Broadmarsh, a landfill site and I have been on a guided walk along the approximate route suggested for trenching and tunnelling pipes through and under residential Leish Park from Broadmarsh to the reservoir,. Last week I revisited the site of the reservoir being constructed, this time with a presentation and Q&A session by a knowledgeable representative of PW.<br><br>My impression is that many customers and consumers are unaware of the reservoir being constructed or the proposal that it be filled partially with water recycled from effluent by the reverse osmosis technique. All customers should have been sent (with their water bills?) information and references about the plans PW have for the reservoir and the proposal SW has for supplying it, maintaining its water level and distributing to [redacted] water works 40km away. There has been publicity but not nearly enough.<br><br>1. I oppose the use of Broadmarsh as a site to construct a recycling plant. My objection is that it is too close to Langstone Harbour (already contaminated with sewage outfalls and other pollutants) and Farlington Marshes (an important RSPB bird sanctuary). Broadmarsh was a landfill site which harbours many pollutants. Building infrastructure above and within this contamination will disturb it, risking the contents more llkely to leach into the sea. Unless they can be contained by some sort of impermeable membrane or other enclosure there is serious danger of further pollution in the harbour while the foundations of a recycling plant are being laid and during its operation.<br>It seems to me that a solar farm is a suitable alternative for this land which I have visited. It is fairly isolated from residential areas in a region with high hours of sunshine compared with most of mainland Britain.<br>I do not know whether the wind climate would allow a wind farm to be viable.<br><br>2. The rising population and increasing number of homes necessitate planning for more water supply: new reservoirs are necessary. Filling the Havant Thicket reservoir with natural chalk stream and spring water is welcomed, providing the precious chalk rivers are conserved. I have reservations about using water from other sources, whether recycled from effluent or by other means. This water is bound to have different mineral constituents than chalk streams which will change the taste and may have ecological consequences. Are there robust plans to alter the processed water constitution to match that from chalk rivers?<br><br>These reservations are nothing to do with the water coming from sewage, providing it is treated appropriately. They are founded on the knowledge that the high pressure needed for reverse | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation involved 8 roadshows throughout our supply area. Here consultees could visit and speak to the team directly. We also undertook 5 webinars, where we directly presented to attendees, who could ask questions about any aspect of our plan and the consultation.<br><br>All of these activities were publicised on our website and on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information.<br><br>We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations.<br><br>SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>1. We acknowledge your support for Havant Thicket reservoir but note your reservation. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. We note your concerns about the chemistry and ecology of the reservoir however the purified recycled water is extremely clean and any water quality impacts are the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are |

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| | osmosis to work requires excessive energy with a likely high carbon footprint. The enormous energy and carbon footprint to both build and maintain the plant is aggravated by the plan to construct, run and maintain a system of piping and trenching to transport the water under or through Leigh Park estate from Broadmarsh to Havant Thicket. The plans are incompatible with reducing carbon footprint to net zero. Leigh Park is heavily residential (once considered to be the largest council estate in Europe) with schools, a thriving Rugby Club and housing which would be disrupted during construction. It is estimated the cost of constructing the recycling plant, piping and trenching will be in the region of £1.2billion, and rising. This is on top of the reservoir price. One wonders how much the poorest consumers will suffer if the price of good quality water increases accordingly.<br>Furthermore, the recycling project will have to run 24/7, even in times of excess.<br>One has to wonder too how many people will buy water bottled in plastic rather than risk drinking from a tap.<br><br>A good idea to discourage clients from consuming excessive amounts of water is to charge everyone a cheaper amount for consuming clean water up to a modest limit. Above this threshold prices per unit volume could increase to deter excess and waste. The more the client uses the more they pay pro rata. Previously it has often been company's policy to give discounts for the purchase of large amounts of their produce. It is time for the opposite strategy in the water industry, to deter clients from using excessive amounts of water.<br><br>3. One has to ask why Southern Water are pushing so hard for recycling effluent by reverse osmosis. They have not offered alternative schemes except to suggest tankering water from Norway in times of water shortage. This is unsustainable, energy expensive and inconsistent with addressing climate change. It is a ludicrous idea which should not be contemplated except in an emergency.<br>Why are they promoting RO recycling so hard? Their track record for water management is poor and they have endured some heavy fines. Can they be trusted to deliver a technical process which is much more complex ?<br>It is more sensible to collect and store excess water locally in rainy times to use during drought or when demand is high. Aquifers are needed for this. SW must have considered this so why have they abandoned the idea ? Why is recycling by reverse osmosis deemed a preferable option ? The pressure to dump sewage in lakes, rivers and seas after storm surges could be reduced by saving water and storing in aquifers when there is a surplus, too.<br>SW should be moved to repair more leaks. Domestic and business consumers should be incentivised to use and waste less water. They should motivate farmers, horticulturalists, glasshouse growers and gardeners to collect and store rain from roofs for use when watering their crops.<br>The idea of abstracting water from further down rivers is sound. The precious chalk water streams and rivers with which we are blessed need protection. By taking out water near their mouths (but above the high tide marks) the flow of water throughout most of the lengths of these rivers would be maintained. I understand this is a relatively novel idea which would protect most of the river from excessive abstraction. | taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. In populated areas such as Leigh Park, large sections of the pipeline would be tunnelled underground, using trenchless techniques, to minimise disruption to the community. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We plan to conduct tariff trials once our smart metering plan is implemented and we have a better understanding of the way demand varies daily and seasonally along with key household attributes (property type, household composition, socio-demographic variables etc). This will help us select a representative sample as well as an appropriate tariff model (rising block, reducing block, seasonal) to test.<br><br>2. We understand that some customers may not agree with using Havant Thicket reservoir to store purified recycled water but the challenges we face finding a sustainable water supply means we must consider these alternatives, as conventional sources are no longer available to us as they once were. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We introduced our Water Saving Audit Programme in April 2024 to help businesses reduce water consumption and save money off their bill by offering a tailored solution depending on their industry and line of work. We have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. The aim of this would be to protect vulnerable ecosystems upstream. We have, for example, considered |

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| | My view is that a mix of different methods of obtaining water should be employed which should not include recycling from effluent. We use a very small percentage of precipitation to extract water for consumption. Let us extract more of our own sustainably in time of need and not rely on expensive technology and tankers of water from Norway! (Normally I do support recycling resources but it is not necessary here.Rainfall is likely to increase as the climate warms)<br><br>4. The water from Havant Thicket reservoir has to be pumped 40km to [redacted] to alleviate the projected shortfall in the relatively wealthy areas between Winchester and Southampton. Why is/was there no plan to build a reservoir there ? The financial and environmental expense of building and laying pipes and pumps to transport the water 40km will endure for decades as an extra burden which need not have happened had planning taken this into consideration.<br><br>I hope the content of this email will be carefully considered. | relocation of the River Itchen WSW abstraction to a point nearly 11km downstream, just upstream of the tidal limit of the River Itchen. This option was not viable however, because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. We will continue to review options on a case-by-case basis over the next AMP.<br><br>3. HWTWRP has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our Water Resources Management Plan (WRMP) no longer includes sea tankering from Norway. |
| WRMP817 | I strongly object to Southern Water's plans to pump treated effluent into the reservoir being built in Havant Thicket, Hampshire.<br>We have had a lot of rain and very little is collected and stored in reservoirs, but we have had lots of effluent discharges into our 'protected' harbours because it's easier to dump than to process. If more reservoirs were built, so more rainfall can be captured, it would help alleviate this major problem. Southern Water's plans to build a new processing plant on reclaimed contaminated landfill at Broadmarsh, will cause more pollution caused by the reject water from this new processing plant, again damaging the ecosystems of both Chichester and Langstone Harbours. Even a Southern Water report confirms this is likely to have a significant effect.<br>Disruption to wildlife habitat to put in pipelines to pump treated effluent to the Havant Thicket reservoir would be very damaging to the environment.<br>Have Southern Water fully investigated cheaper alternatives that would be more sustainable in the long term. Less damaging to the environment.<br>Then we have a pipeline ripping across the countryside over 40k away to deliver water to where it's needed.<br>I for one, have lost confidence in Southern Water, they already pollute our harbours and rivers, now this proposal will destroy a chalk fed reservoir's biodiversity.<br>I will not be drinking recycled effluent so sadly will be switching to bottled water.<br>Please reject these proposals and insist alternative environmentally, sustainable alternatives be found. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes the construction of two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and the proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |

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| | | Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects. |
| WRMP818 | I'm writing to object to Southern Water's water management plan.<br><br>Southern Water's £1.2 billion proposal to recycle treated wastewater for the Havant Thicket Reservoir is misguided. Instead, we must prioritise sustainable practices that capture and store increased winter rainfall in new reservoirs and aquifers, which would address flooding and enhance biodiversity.<br><br>The current leakage rates are alarming: 22% of water is lost before reaching customers. Southern Water must implement a rapid and effective plan to renew their aging pipe network; a replacement cycle of 1 in 1000 years is simply unacceptable.<br><br>Southern Water's history of pollution incidents raises serious doubts about their ability to manage complex effluent recycling technology. Trust is lacking when their operational failures have already jeopardised local ecosystems.<br><br>To achieve carbon neutrality by 2030, Southern Water must develop environmentally friendly strategies that minimise carbon footprints. Their current plans prioritise high-emission alternatives, which are incompatible with the urgent need for sustainable solutions.<br><br>Constructing the effluent recycling plant on a contaminated landfill poses unacceptable risks. An alternative site must be identified to protect the chalk aquifer and surrounding environments from potential pollution.<br><br>This is a major concern so I very much hope my objection will be taken into consideration. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst |

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| | | having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP819 | I am very disappointed to have read the proposal from Southern Water (SW) after supporting, with some excitement, the original proposal from Portsmouth Water (PW). I object to SW's draft Water Management Plan on several issues.<br><br>Storing raw/rainwater water and having recreational use for the Havant Thicket reservoir provided a sustainable, all year round water storage facility for many potential uses and a reduction in the need to find water in other locations.<br><br>The UK only collects about 1% of rainwater, the proposed solution is not doing this and is recycling dirty water from the [redacted] Waste Water Treatment Works ([redacted]) to pump it to Havant Thicket reservoir. The solution should be to improve storm water capture and storage across the region and/or abstract water further downstream closer to estuaries where greater volumes can be captured.<br><br>Other issues with the proposal include: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much |

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| | Significant new infrastructure with huge environmental impact and damage where more simple schemes would suffice. See below<br>The new builds would require running costs leading to higher customer bills, increasing the net worth and share price of SW but not providing a cost benefit to the customers.<br><br>For example<br><br>The SW Broadmarsh ERP is on the coast perhaps 10 -15m above mean sea level. Havant Thicket is over +25m above this. Constantly supplying and pumping 365 days/annum even when it's not needed is hugely energy demanding and entirely wasteful.<br>SW is also intending to pump treated effluent up 90m to Portsdown Hill to gravity feed there to a Water Treatment Works over 40km at [redacted], increasing energy demand even higher.<br><br>SW is not constructing an ERP for PW customers. The Havant Thicket approval was not therefore granted to take recycled effluent. The fundamental purpose of the original application for a reservoir for raw water storage has significantly changed. Effectively, SW is attempting to subvert full public engagement by using Havant Thicket for another purpose.<br>According to SW in their July and August 2022 initial consultation on the re-cycling of ""dirty"" into ""treated"" water pumped to Havant Thicket, they had PW's approval. This is contrary to how it was conveyed in 2020.<br><br>Add in the UK's Net zero Carbons emissions target for 2050. Why then would anyone consider pumping 365 days a year – an extremely expensive process.<br><br>PW is not intending to monitor water quality in their new Reservoir but instead rely on SW. Water Quality needs independent monitoring!<br><br>SW has a poor reputation for fixing leaks currently at a rate of 19% and therefore cannot be trusted with these large scale infrastructure projects until they prove they can fix the waterworks!<br><br>The financial burden to SW consumers of a new ERP at Broadmarsh and pipes to Havant Thicket Reservoir is now £1.2 to 1.4 billion or £30/annum per customer.<br>Three Winter storage reservoirs could be built for the Broadmarsh ERP (the estimated cost for the construction of the Havant Thicket Reservoir is £350 million).<br>The [redacted] Water Treatment Works meanwhile is not expected to be served by Broadmarsh until 2035/40 and in drought conditions could be expected to rely on Ocean Going Tankers from Norway.<br><br>What a crazily expensive and emission rich solution when a rethink of the project could solve all of this. | shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. All of our drinking water sources will continue to be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | SW's [redacted] persistently fails. It discharged raw sewage into the "Protected" Langstone Harbour for 181 hrs in the eight days between 24th October and 1st November 2024. This is not a new failure.<br><br>SW is able to earn profits from investing in new infrastructure but not from maintaining pre-existing infrastructure – this is perhaps the fundamental reason for this mammoth planning process resubmission and is wholly wrong. Improving the profits of SW over the benefits of its customer base is a travesty and DEFRA should stop this proposal, at the very least, review it via a postponement of the decision.<br><br>There is No Economic or Environmental Benefit in DEFRA authorising the grant of a Development Consent Order for Effluent Recycling Plant at Broadmarsh. | Regarding the suggestion that three reservoirs could be built for the cost of Broadmarsh ERP, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding prioritisation of recycling water at River Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. These would be considered for WRMP29.<br><br>Regarding effects on coastal water bodies, A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP820 | No to recycled drinking water that's treated sewage | Thank you for reviewing our rdWRMP24 and providing feedback. We note your objection to the use of recycled water in Havant Thicket. |

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| WRMP821 | I live in close proximity to the new reservoir and was delighted when I heard it was going ahead. What a fantastic idea to fill the reservoir from excess spring water lost during the winter months.<br><br>However, I was very concerned when I learned that southern water are proposing to pump treated effluent to the site.<br><br>Some of my concerns are as follows<br><br>Southern water have a very poor track record with regard to pollution incidents and I would find it difficult to trust them to send suitably treated effluent to the site.<br><br>I understand that Southern Water loose 100mega litres of treated drinking water every day through leakage. Surely this issue should be addressed as a high priority?<br><br>The water from the reservoir will probably taste different and as more customers realise they are drinking treated effluent there will be many complaints. Many people will not want to drink the water, I and many others won't allow their children to drink it. This will definitely increase the number of bottled water sales meaning more unwanted plastic waste.<br><br>There will be additional treatment required to get the treated effluent to a suitable standard which will be extremely expensive, of course with the customer paying the extra costs.<br><br>Additional pumping and treatment will increase the carbon footprint of the process. Surely we should be looking at more carbon friendly processes?<br><br>We should be finding ways of storing more rainwater. There would high initial costs to build rainwater storage but so much cheaper and greener in the long run.<br><br>Very few people in my area seem to be aware of southern waters plans. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP822 | I am writing to express my deep concern regarding Southern Water's plans to recycle treated wastewater into drinking water, including the proposed effluent recycling schemes such as the Havant Thicket Reservoir project. These plans are deeply troubling and fail to address the pressing need for sustainable, long-term solutions to water management in the UK.<br>Southern Water's history of pollution incidents, inadequate maintenance, and numerous prosecutions has eroded public trust. Their inability to properly maintain traditional water infrastructure raises serious doubts about their capacity to manage the complex and untested technology required for effluent recycling. This creates an unacceptable risk to public health and the environment.<br>The UK receives abundant rainfall, yet only 1% is collected. Instead of turning to unsustainable and high-risk recycling schemes, Southern Water should focus on sustainable water management solutions:<br>• Reduce Leakages: Southern Water must prioritise a comprehensive program to renew its outdated pipe network NOW<br>• Invest in Rainwater Collection and Storage: Building new reservoirs and confined aquifers to capture winter rainfall for use during dry periods offers multiple societal benefits, including flood management, biodiversity enhancement, and recreational opportunities.<br>• Sustainable Water Transfers: Developing low-energy solutions like local storage and transfers would mitigate the environmental and carbon impacts of long pipelines. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | The proposed effluent recycling schemes have the highest carbon footprint among the options considered, which contradicts Southern Water's commitment to becoming carbon neutral by 2030. Moreover, the risks associated with building recycling plants on contaminated landfill sites near Langstone Harbour and the Solent are simply unacceptable. These schemes appear to prioritize profit—estimated at £45 million for the Hampshire recycling project—over environmental and societal responsibility. Customers should not bear the burden of servicing the significant debt created by such costly and unsustainable projects.<br>Southern Water has failed to adequately inform and consult the public on these critical plans. Withholding 12 volumes of detailed information from public view only adds to the perception of a lack of transparency. A more open and inclusive consultation process is essential for trust-building and for ensuring that better alternatives are considered.<br>I URGE Defra to reject Southern Water's current plans and demand the development of a more sustainable strategy. The focus should be on solutions that work with, not against, climate change and that prioritize environmental protection, public health, and long-term societal benefits.<br>The state of the UK's sewage and water management systems is a national disgrace, and this situation must be addressed urgently. Allowing these plans to proceed without accountability only perpetuates a cycle of mismanagement and public distrust. We deserve better from those entrusted with our most vital resource.<br>Thank you for considering my concerns. I trust that Defra will act decisively to demand better from | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

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| | | Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below:<br>https://waterresources.southernwater.co.uk/find-out-more/ |
| WRMP823 | We are writing to object to Southern Water's revised plan for the Havant Thicket recycling plans. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | As local doctors we are extremely concerned regarding the health implications for our population. The precious commodity we have locally of the chalk stream water should be protected. This water will be entering the reservoir only to be contaminated by recycled effluent. Southern Water cannot be trusted. They are responsible for the contamination and pollution of our coastal waters. We strongly feel we should not be trusting them with these proposals for our drinking water supply. The building and new pipework required for the proposal again ignore the huge environmental cost.<br>The recycling of more effluent and the proposal to tanker water from Norway to Southampton in the event of drought is not a solution, both expensive and environmentally unsound. Better, more sustainable options to store significantly more than currently (only 1% of winter water) and do more to reduce the enormous loss of nearly a fifth of treated water (by repairing leaks and replacing mains) should be the priority.<br>We have the responsibility to the local population for generations to come to challenge this illogical and risky plan. | Regarding the quality of recycled water, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP824 | We are responding to the consultation on the Southern Water (SW) revised draft Water Resources Management Plan (WRMP).<br><br>Having carefully considered the Plan and reviewed additional information provided by other parties we make this strong personal appeal that the WRMP should be firmly rejected by Defra as unfit for purpose. SW should be directed to go back and start again and review all options for | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. This process does not allow companies to choose to start again if not directed to do so |

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| | improving water availability in the future in a thorough, non-biased manner to produce a Plan that takes full advantage of all the rain that falls freely from the sky in a cost effective and environmentally-friendly manner. Our fourteen key concerns and arguments for this rejection of the WRMP are as follows.<br><br>1. The WRMP was not properly re-done as Defra directed when it previously rejected it some years ago and SW have persisted in delivering the most expensive infrastructure option possible in terms of both construction and operating costs plus the fact that it will be by far the most environmentally damaging option. The proposed Hampshire WT&WR Scheme, together with those similar effluent recycling schemes in the IOW and in West Sussex have been chosen as priority by SW because they can charge their customers much more for big infrastructure schemes than other workstreams such as leakage repair. They have clearly done everything they can to maximise the arguments in favour of this scheme to the detriment of investigating and bringing forward promptly other schemes that can make a difference at a lower cost to consumers, many of whom are already cash-strapped with the various demands made on them. It is unacceptable that the pursuit of high profit should override the delivery of a basket of lower cost options that will be better for consumers in terms of increased cost to them and better for the environment by far through not having high energy (carbon) and chemical demands and increased toxicity of waste water discharged to Langstone Harbour and The Solent.<br>2. SW have failed to address Demand Management with sufficient urgency. They need to educate households and non-household organisations as to how they can reduce their usage of water and push forward their installation of smart water meters asap. It is a medical maxim that 'prevention is better than cure' and it should be a water maxim that 'reducing demand is better than spending much money on increasing availability'. As a household we persistently manage on 90 litres per person per day, well below the current UK average of nearly 140l/p/d and we do this by just using water sensibly, showering not bathing and never using a hose. By explaining to people how to reduce use (with the carrot that bills can reduce or at the very least not rise nearly so much) demand could be lowered by up to 25% we suspect. Reducing daily usage to only 110l/p/d by only 2045 is not demanding enough and both the Government and SW should do much more than this. Education and associated technical assistance to non-household customers can also make a huge difference as SW have already demonstrated. At Annex 14 section 2.4.2 SW reported on a school water audit in Hampshire where, by working with the school, they enabled them to save 3 million litres a year and halve their water bill. This should be a high priority now to address potential water deficiencies and would be very good for the environment and to reduce costs incurred by non-household customers.<br>3. SW has failed to apply enough effort to reduce water wastage by fixing leaks from the mains at a much higher rate than at present, using both local repairs and mains replacement at a swifter pace. SW currently loses around 100 million litres of water per day that has been treated for customer use, enough to supply around 750,000 customers their needs every day at current average rates of water use. That is a shocking waste of customers money and the effort spent in producing the potable water. There is insufficient urgency shown in the Plan to address this disgraceful waste. The Plan shows that a high level of effort will only be applied after 2035, the due date for delivery of the Hampshire WT&WR Scheme. As with other low effort on demand management and introducing better cumulative options this seems quite simply a ruse | by the Secretary of State. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by the Defra and our regulators. We will continue to do so.<br><br>1. Regarding the need for a new consultation, we consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our rdWRMP24 in 2024.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value.<br><br>Despite having one of the lowest PCC in the country, we have an ambitious demand management programme. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government. By 2050, our PCC will be lower than 110l/h/d. Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency. Our home visits programme and schools programme are specifically targeted at raising awareness about water use and providing helpful tips on reducing water consumption in homes. In AMP8 we will be building a Water Calculator to help educate customers on their own water use and provide useful practical advice on how to save water.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket |

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| | to make have the WT&WR Scheme the only viable option before 2035 and thus get it approved. Even by 2050 they will only have halved the loss meaning that customers will still pay to have 50 million litres per day treated that will then be lost to the ground. It is both reprehensible and absurd that Southern Water plans to spend vast sums creating water from sewage effluent whilst abjectly failing to address the huge losses from its network. This is unacceptable practice and must be addressed by Defra as a matter of urgency.<br>4. SW has failed to bring forward some quick wins to improve water availability. Moving the [redacted] abstraction to the tidal limit on the River Itchen would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and enable natural flows down the river to be sustained in a drought. Other abstraction points on rivers could be similarly moved such as on the Adur and the Test. Also, the River Test Managed Aquifer Recharge Scheme (MARS) should be brought forward.<br>5. SW are not urgently investigating and bringing forward new reservoir and other aquifer-based storage schemes. The UK receives a huge amount of freely given rainfall yet only traps 1-2% of what hits the ground with the rest being lost out to sea. That is so wasteful and this country, blessed with its prevailing south westerly winds off the warming Atlantic, should be making far more use of this freely given water and storing it wherever possible. While there is a capital and energy cost to developing new storage sites, once built they cost far less to run than an effluent recycling scheme that has to run every day of the year pumping water many miles, even in prolonged periods of wet weather. Reservoirs offer far more than just water supply; they help reduce flooding, provide recreational spaces, boost biodiversity, and act as buffers against the significant and worsening impact of climate change.<br>6. SW are using the most pessimistic assumptions regarding population growth (23%) in its area for the period 2025-2050, considerably more than in the last Plan, even though the industry regulator Ofwat has confirmed they can use the much lower ONS population growth figures of 16%. They have also assumed no abstraction at all on the Rivers Itchen and Rother, not even in winter when river levels are high or even in flood, going beyond the required reductions. Assuming too high a level of population growth and deliberately cutting abstraction by more than is required clearly inflates the need for more water unnecessarily, thus making the case for developing the most expensive option of effluent recycling. This is effectively setting the conditions to make the effluent recycling scheme fit the requirement and justify it over other, smaller options that cumulatively would deliver the same effect of ensuring water is available to the required amount.<br>7. SW has made it very difficult to obtain detailed information and data on the options that it has looked at and has failed to be open and transparent with the public and representative organisations. Throughout the consultation it has failed to consult properly with the public and not shown any clear evidence of thoroughly considering all the options available in an unbiased manner. 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 [redacted] 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. Too much has been hidden because SW realise that their Plan is full of contradictions and inadequate reasons for | Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>2. For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. |

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| | not taking forward better, more cost-effective options to address potential (not certain) water shortages. 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.<br>8. No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] 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 & [redacted] 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. It would seem that this work would be less costly and therefore not enable SW to get as much profit from customers charges, even though as a recycling option it would be better for the environment. SW has already admitted they have not fully investigated or modelled the implications of their chosen approach to fill the chalk aquifer-fed reservoir with recycled effluent, raising serious questions about their decision-making process.<br>9. Customers and others 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 at [redacted] and [redacted], pollution incidents and other problems. Most of these are persistent human error but also poor maintenance. What certainty is there that the Company can operate the complex advanced effluent recycling treatment technology without incident, particularly if they try and do it on the cheap to save expenditure and increase profit? The new reverse osmosis process has not been used successfully before in the UK and requires to be carefully monitored and controlled. 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. Also, SW appears to mislead the public by referencing eight global regions using effluent recycling for drinking water. In truth, only five of these employ the Reverse Osmosis process proposed for Havant and just one of those five discharges treated water into a reservoir—a truly flimsy and misleading precedent for their plans. Most schemes use underground aquifers with long retention times, a far less disruptive and more proven approach. Most of the recycled water in these eight areas is not used for | Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>3. Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 2 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP24 in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature. |

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| | human consumption but for municipal, industrial and farming purposes adding further to the deception.<br>10. The proposed Hampshire WT&WR Scheme will cost a great deal to construct (£1.2 billion and rising at present) and operate all year round (£3 million and more per annum). All this will be a financial burden to many cash-strapped householders. It will also be environmentally costly. That such a scheme should be put forward to address a very rare long drought in several hundred years is unbelievable. It should be noted that, with the cost of the Havant Thicket Reservoir being about £350M to build, SW could build another 3 reservoirs for the price of the Hampshire WT&WR Scheme and have much cheaper running costs thereafter. SW's plans clearly prioritise their profits over environmental impact. It is evident that alternative, much more environmentally sustainable solutions for securing additional water have been sidelined or delayed to ensure that recycling sewage effluent becomes the favoured option. This approach is driven by the substantial profits, estimated at £45M that Southern Water stands to gain from effluent recycling, far exceeding the financial returns from other methods. We noted SW's recent credit rating downgrade to ""Junk"" status by Moody's and this will make any borrowing much more expensive. They will need to reconsider their strategy as greater credit costs will significantly increase their expenses beyond what was originally planned.<br>11. Examining SW's Plan's Environmental Impact tables show that:<br>• The Havant and Littlehampton effluent recycling schemes have the highest NEGATIVE environmental impact score of any of the options considered, and yet they are the preferred options.<br>• The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by a fleet of eight sea tankers and yet all of these options are preferred to any others.<br>• The proposal to transfer water from Norway via eight sea tankers is utterly implausible with no dedicated berths at Southampton Docks, the water's high acidity would require extensive new treatment facilities, and a costly, long pipeline would be needed. This idea seems more like a deliberately unviable option to make effluent recycling appear more reasonable by comparison.<br>12. SW recently trialled reverse osmosis plants in Havant ([redacted]) and also in [redacted], but the results were deeply concerning and cast serious doubt on the technology proposed for full-scale deployment. The trial equipment evidently failed to remove unexpected contaminants and even introduced new pollutants into the output water. Southern Water claims the full-scale technology will differ, raising the critical question: why wasn't the trial conducted with a more representative system to ensure its ability to deliver pure, contaminant-free water? DEFRA should demand answers, as the trial data - FOI delayed for over 12 months, reveals alarming findings. Some of these were:<br>a. Bacteria found in output water despite expectations of complete removal.<br>b. Total dissolved solids found in levels above zero, contrary to expectation.<br>c. Heavy metals including arsenic, lead, salt and strontium found in the output water.<br>d. Traces of 'Forever Chemicals' were detected in some samples.<br>e. Volatile Organic Compounds including toluene and xylene were found in the treated water.<br>f. Significant levels of personal care products were found in the output water. | The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. We need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We have excluded options in cases where drawbacks outweigh benefits or where the environmental challenges cannot be satisfactorily overcome.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Regarding the suggestion that three reservoirs could be built for the cost of Broadmarsh ERP, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan. |

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| | All of these will end up in the reservoir and pollute the water entirely unnecessarily, causing further problems at water treatment plants. In addition, there was no testing for microplastic/nano plastics and no consideration given to the impact of tankered industrial waste with unknown constituents at [redacted] WwTW. While engineers can be trained, they are operating within a finance-driven culture that pares essential maintenance expenditure to the bone. Can a company which appears to operate a 'fix on failure' attitude to its essential plant and pipeline network be up to the task of maintaining and operating the complex technology required for reverse osmosis when we know from other operators the technology is very difficult to maintain? With membranes being extremely expensive will they actually replace them soon enough when they start to degrade?<br>13. 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. Also, 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.<br>14. 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.<br>Conclusion<br>The SW draft revised WRMP is a document designed to push forward and gain approval for the most expensive large infrastructure projects possible, namely effluent recycling at Havant (Hampshire WT&WR Scheme), Sandown IOW) and [redacted] (West Sussex) while at a much lower priority taking slowly forward better options that would obviate the use of the aforementioned 3 schemes. If this WRMP is approved customers will be paying large bills for decades to cover the huge building and operating costs of each WT&WR scheme and the environment will suffer greatly from the high use of energy and chemicals, the discharge of toxic wastewater into the local waters and the greatly increased use of bottled water with the resultant need to deal with all the plastic that results. We strongly urge Defra both to reject the SW revised draft WRMP as being unfit for implementation and to direct the Company to investigate and bring forward the cheaper and more practical options discussed above." | All of the hormones tested in the trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP825 | In regard to the proposed plan you add recycled water into the thicket reservoir, I am strongly against this as I do not believe that the high standard required will be met on a permanent basis.<br><br>As is known that southern water DO NOT undertake comprehensive clean water standards, they cannot be relied upon to keep the reservoir clear of dirty/ sewage water in the future. | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket.<br><br>The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. The water at customers' taps will continue to meet strict drinking water quality standards and |

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| | | be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP826 | I am writing to express my concerns about Southern Water's proposals for recycling treated sewage into our water supply.<br><br>I am a Portsmouth Water customer, and was very supportive or their proposal to create the Thicket reservoir that would have both stored clean water and provided a much needed recreational amenity. However allowing Southern Water to us it to store recycled water will destroy the amenity, and contaminate our supply.<br><br>I also live on Chichester Harbour and was horrified by the findings of the recent research demonstrating how polluted it is, including pharmaceuticals, and that this is largely due to Southern Waters discharges into the Harbour. We need assurances that this will not get worse with their proposals.<br><br>I do not know enough about the financial implications of Southern Water's proposals, but, based on their past record, I suspect that they have been chosen as the most profitable option for their shareholders, rather than in the best interests of their customers and the environment. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP827 | I am strongly against Southern Water's proposals to mix potentially contaminated water with the very clean fresh water derived from the local chalk streams and aquifers.<br>The physical interference with the local collection areas could be disastrous and pollute the collection of clean water.<br>The scheme requires enormous energy supplies to install, run and pump the water which are not/will not be available in a net zero carbon emission situation.<br>Other storage solutions, including more reservoirs, should be considered, as well as eliminating distribution losses, before forcing re-cycled effluent as public drinking water.<br>The way sewage is handled at the moment illustrates how the assurances of Southern Water are meaningless. They should not be allowed anywhere near our clean water supplies with recycled effluent. | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket has been noted.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. In this instance, this new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. |

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| | | We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. |
| WRMP828 | The Southern Water effluent recycling via Havant Thicket plan doesn't make sense environmentally or financially. We are asking you to reject these proposals and force Southern Water to investigate more sustainable and cheaper alternatives.<br><br>Climate change means we are getting more rainfall and this is predicted to increase further. Rainwater needs to be seen as a valuable resource and stored in reservoirs for use in dry periods. A combination of smaller local reservoirs, aquifer storage and catchment management would give more flexible and sustainable responses to water needs.<br><br>Southern Water needs to reduce the water lost to leaks, currently 20%. Their plan to address leaks needs to be far more ambitious, and this would make a significant difference to the amount of water needed.<br><br>Urgent action is needed to protect the Rivers Test and Itchen and to reduce the volume of water abstracted. A relatively simple measure would be to move all abstractions to the bottom of the catchments.<br><br>It seems quite wrong that Southern Water is favouring a scheme which is so expensive and has so many adverse environmental effects without investigating the obvious alternatives. The effluent recycling scheme would operate all the time, irrespective of whether there is a drought, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations).<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each |

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| | consuming energy, creating greenhouse gasses, using chemicals and further damaging marine life.<br><br>The obvious conclusion must be that Southern Water and its main owner Macquarie are acting only for profit rather than for the benefit of the customer or the need to care for the environment. That this situation can even arise is of great concern. Water companies are natural monopolies and should be compelled to operate in a sustainable way for the benefit of water users and without damage to the environment. We hope that the government will recognise the need to protect the consumer and the environment rather than the interests of shareholders.<br><br>As Southern Water customers, we have been shocked at how little information we have been given about this. Nothing about these plans has come in the post, and we only found out about the scheme via resident groups. When we attempted to object on the Southern Water website in August this year, we were told that the consultation period had already ended and our objections would not be taken into account. We trust our views will be taken into account on this occasion.<br><br>We hope you will also remember the shocking record Southern Water has for discharging untreated sewage into bathing water around the coast. As residents of Hayling Island, we have been particularly badly affected in Langstone Harbour, the location of the [redacted] treatment plant (and location of the proposed effluent recycling process), where untreated discharges continue to occur regularly, most recently two days ago.<br><br>We are hopeful that you will be able to address our concerns and take action to look after water users and the environment. | successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. A consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern |

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| | | Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1,176 responses as part of rdWRMP24 consultation.<br><br>Thank you for reviewing our rdWRMP24 and providing feedback.<br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; *The Guardian* and the *Financial Times*. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br>We have received 1,176 responses as part of rdWRMP24 consultation.<br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19 December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid |

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| | | to previous shareholders.<br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact, etc., in addition to capital and operating costs. The selection of the Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11 km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations).<br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community-level initiatives. |

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| WRMP831 | I am writing to express my concerns about the Southern Water plans for Water Resource Management. There are many reasons why I oppose this plan however I will focus on two that cause me the most concern.<br><br>Firstly the loss of water due to leakage. Currently I understand that Southern Water loses 100 million litres of water every day to leaks. This is 19% of all the water abstracted from the environment. There is a programme to address this, but this seems slow and insufficient. Whilst addressing leaks would not completely solve the problem of clean water, put together with other initiatives and water saving plans, it would seem a better and more environmentally friendly alternative to the proposed sewage recycling plan.<br><br>Secondly, the Southern water plan to build the recycling plant more than 40km from where the recycled water is needed is not a sustainable solution. I understand that the treatment plant will need to run 365 days a year irrespective of the rain fall levels, which seems an expensive and poor use of energy.<br><br>There are a number of environmental objections to this proposed scheme (e.g. the environmental impact of concentrated reject water discharging into the Solent). The Southern Water plan has not properly taken into account the environmental impact and will be detrimental to the environment and the health of the planet. I therefore urge you to turn down this Water Resource Management plan and ask Southern Water to devise a more environmentally sound project. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP832 | Dear Sir/Madam<br>I do not support southern waters plans for thicket reservoir and associated effluent recycling proposals.<br>There are many reasons but the chief are:<br><br>1 as we only capture 1% of rainfall this plan is shortsighted and unambitious. We should be climate proofing all major utilities and that includes capital investment to capture more rain<br><br>2 I do not trust the water company's decision on effluent recycling proposals. It's not been done before , untested in the uk and will lead to a massive rise in the number of people that use plastic bottled water . And Langston harbour will deteriorate. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | 3 southern water is awful at communication and consultation. There is no trust in them and so none for their proposals. There is little accountability .<br><br>So it's up to defra to stand up for present and future generations of consumers and send these plans back so that better decisions can be made. | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP833 | I would like to make the following points:<br><br>1. Southern Water only collects 1% of rainfall. With climate change, winter rainfall will increase, so Southern Water should make the most of this free and natural resource, by storing it in new reservoirs and aquifers across its area.<br>2. Southern Water lose 100 million litres of water every day, either before it reaches the treatment works, or a further 19% that customers pay to treat. SW need to increase significantly their water main replacement rate to reduce this loss.<br>3. Southern Water have an unenviable reputation of effluent spillages and leakages using normal traditional infrastructure. As such, it is not possible to have any confidence in them to use advanced effluent recycling treatment technology without mishap. This would cause further damage to Langstone Harbour and the Solent and other areas.<br>4. There has been a complete lack of information from Southern Water: why haven't they informed customers, who would be the future consumers, instead of trying to go behind our backs? Absolutely no public consultation.<br>5. The creation of the chalk spring fed reservoir at Havant thicket was a unique biodiversity opportunity, but Southern Water now plan to completely ruin that. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | 6. Why is the recycling plant being built so far (40km) from where the water is needed at [redacted]? It will be expensive to build and energy costs to transport the water this considerable distance every day of the year will be huge.<br>7. Southern Water need a more sustainable plan. Why opt for the most expensive option, other than that it will give them the most future profit, at the unnecessary expense of their captive customers. | A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Using Havant Thicket reservoir to store purified recycled water |

| Reference | Feedback | Southern Water Response |
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| | | has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. |
| WRMP835 | I am writing to express my concern about Southern Water's proposed "reverse osmosis" plan for Budd's Farm and Havant Thicket reservoir.<br><br>Southern Water has a very poor record of polluting Langstone Harbour, where I live, and of presenting unhelpful data about their activities. Overflow into the harbour is supposed to happen in exceptional storm conditions, but we have seen it happen in dry weather. I do not believe we can trust them with a new, untested in the UK, technology to produce water fit for human consumption.<br><br>There are still millions of litres of clean water lost through leakage in the pipe network which has not been well maintained: who says the new plant would be any better maintained?<br>Why not stop the leakage, and build new reservoirs, rather than planning to import water from Norway, with a huge carbon footprint and increased pollution. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

| Reference | Feedback | Southern Water Response |
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| | I feel this needs proper public consultation. | With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br>www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Sea tankering from Norway is no longer included in our plan. |
| WRMP836 | Please register my objection to the proposed plans for Havant Thicket by Southern Water.<br><br>It would seem logical and sensible to first focus on reducing the huge daily wastage of water lost to leaks in their system.<br><br>Having said that, I also object to the proposed recycling of waste water from the sewage plant back into the reservoir - who thinks these things up? | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP837 | I wish to register my opposition to Southern Water's plans to use Havant Thicket Reservoir as temporary storage for partially treated sewage.<br>I am a local resident who supported the construction of a new reservoir, despite the damage to existing wildlife habitats, on the basis that it would provide new high quality wetland habitat. I would not have supported this had I known that treated sewage would be discharged into it.<br>I am also a customer of Portsmouth Water so would be an unwilling recipient of water 'purified' through the proposed treatment methods.<br><br>My main concerns are:<br>1. Sustainability. In view of the challenges posed by climate change, Southern Water should adopt a more forward-thinking approach and develop schemes which focus on harvesting our plentiful, and increasing, winter rainfall. This could dovetail with other pressing needs to respond to flooding risks and to provide natural habitats for our threatened wildlife. Additionally, Southern Water could move its abstraction sites further downstream to avoid unnecessary environmental damage to our rivers and streams. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | 2. Fix and maintain the current system. Southern Water loses millions of litres of water to leakage every day. They should take better care of our scarce resources before they get permission for costly and carbon-intensive new infrastructure projects.<br>3. Unnecessary, risky, and costly over-engineering. Southern Water's poor record on treatment plant and pumping station failures is well known, as is their history of prosecutions for pollution incidents. There is little in Southern Water's past record to reassure anyone of their competence in safely operating this new and complex technology, without unacceptable interruption of water supply or pollution to important local habitats.<br>4. In whose interest? This project seems to have been designed to make the most of the funding mechanisms to maximise profits for shareholders. I hope DEFRA will ensure that any water harvesting and treatment schemes put people and the environment ahead of shareholders' interests.<br><br>Your faithfully | We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |

| Reference | Feedback | Southern Water Response |
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| WRMP840 | We are extremely concerned about Southern Water's revised draft Water Resources Management Plan which is open for consultation until tomorrow. We feel that it puts profit before local people and the environment.<br><br>We also feel that there has been inadequate publicity and consultation about Southern Water's plan.<br><br>We've got five major concerns, based on research that we have been carrying out.<br><br>1) Southern Water's plan is taking us down the wrong path<br>In planning a £1.2 billion scheme to recycle treated waste water into Havant Thicket Reservoir, along with 3 other recycling schemes, Southern Water is taking us down the wrong path.<br><br>We need a plan that focuses on developing more sustainable solutions first, that work with climate change to collect the forecast increase in winter rainfall and store it in new reservoirs and confined aquifers for use in dry summers. We get plenty of free rain but only collect 1% of rainfall in the UK. Collecting and storing more water in winter would also provide multiple benefits to society, helping to reduce the forecast increase in flooding, provide recreational sites for our communities, and provide biodiversity opportunities if we build more reservoirs.<br><br>2) Southern Water need to be far more ambitious on leakage reduction<br><br>Southern Water need to have a much more ambitious programme of action to reduce leakage, 3% of water Southern Water take from the environment is lost before it even reaches the treatment works, then a further 19% of water that customers have paid to treat is currently lost to leakage in the distribution network, that's more than 100 million litres of precious water lost every day. Southern Water must be required to deliver a much faster programme of renewing water mains to replace their ageing pipe network, or they will never get leakage under control. Having a replacement rate of just 1 in 1000 years when a water main is only designed to last 120 years is just unacceptable.<br><br>3) As Southern Water cannot be trusted to operate & maintain its current traditional infrastructure without causing pollution, what hope is there of it safely operating the complex advanced effluent recycling treatment technology without incident?<br><br>How can we trust Southern Water with the complex technology required to treat final sewage effluent, which has not been used for this purpose before in the UK? Southern Water have a very poor track record of treatment plant and pumping station failures; there have been many prosecutions for pollution incidents and failure to take prompt action to rectify problems. The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable.<br><br>4) Southern Water need to do more to protect the environment, and develop a strategy that helps them honour their commitment to be carbon neutral by 2030. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | Our river catchments could be protected much more quickly if they moved river abstractions closer to the tidal limit, and abstraction boreholes down the catchment, reducing the priority for abstraction reform which is driving the need for effluent recycling.<br>Storage options need to be developed closer to where the water is needed, so that long pipelines that damage our countryside and wildlife are not required.<br>Options need to be developed that do not have such a high carbon and emissions footprint. We need a strategy that prioritises low energy solutions, the energy alone for the Hampshire scheme will cost more than £3 million/year. With pumping and treatment needed 365 days a year, even though effluent recycling was selected as a drought resource.<br><br>5) The risks from developing the effluent recycling plant on a landfill are unacceptably high<br><br>If despite all of the concerns about whether effluent recycling is needed, the significant environmental impacts, and the enormous costs to build & operate are to be ignored, Southern Water are to go ahead with their leaky plan, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br><br>What is to be done?<br><br>We would like express to you our deep concerns over the integrity of the future of their drinking water and we request the appropriate authorities to consent to the following action:<br><br>• To carry out and publish an in-depth independent review of the entire proposed infrastructure by independent qualified professionals in this field.<br>• To carry out and publish an in-depth independent review of the ability for SW's recycling engineering to satisfactorily cleanse the recycled effluent removing all known chemical pollutants and pharmaceutical contaminants by independent specialists in this field.<br>• To carry out and publish an in-depth independent review of the costings of all the proposed infrastructure, pipes, pumping stations, etc. by independent financial advisers.<br>• To carry out a costing analysis of the ongoing maintenance required for a project that will be required to run daily all year round and not just in drought conditions and to forecast the life time of such a project.<br>• To carry out an independent review of the state of the infill-site at Broadmarsh which will be cut open to enable all the 45kms of piping required to transfer the water to the [redacted]X pumping station and beyond.<br>• To carry out and publish an in-depth independent forecast of the chemical and health impacts the opening of this infill site will have on the harbour and communities.<br><br>We look forward to hearing from you. | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our regulators the EA, NE and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the plan, including the options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it. The options and risks are assessed independently by the Regulators Alliance for Progressing Infrastructure Development (RAPID), a partnership made up of the three water regulators, Ofwat, the Environment Agency and the Drinking Water Inspectorate through a Gated Process, and by the Environment Agency, Natural England and Defra through the WRMP process.<br><br>Southern Water is working with international experts, other UK water companies and regulators to understand and manage the complex operation and maintenance of a reverse osmosis plant. The plant would follow international best-practice treatment and maintenance regimes, be operated by specialists and overseen by water industry regulators. Monitoring and regulation of releases to the environment would be undertaken by the Environment Agency.<br><br>We are working with WRSE in response to the EA is recommendation 3 and further to other regulatory discussions and we have asked WRSE to commission an independent review of the options we have in the Western area. Specifically, this project will review the WRMP14 and WRMP19 list of options and the gate 1 submission. This review should see if there are any other short-term solutions that could be developed instead of using drought orders / permits on the Test and Itchen. which will be focussed towards seeing if there are any other short-term and medium-term solutions that could be developed instead of using drought orders / permits in the Western area. We anticipate this work to be completed in around summer 2025, following which we will discuss this with our regulators and incorporate as appropriate into the WRMP annual process and as we start to prepare for WRMP29. |
| WRMP842 | Dear Sirs, | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | I wish to register my serious concerns over Southern Water's Draft Water Resources Management Plan. I request that DEFRA reject Southern Water's plan and require them to submit a modified and more sustainable proposal.<br><br>I have many areas of concern. Some of the most important for the proposals in Hampshire are:<br><br>1. The huge carbon and energy cost of the project. In both the construction and operational stages of the project, these are unacceptably large compared to all alternatives.<br>It seems unacceptable that to address water requirements for a 1 in 500 year drought provision, Southern Water proposes a scheme requiring continuous water recycling and pumping. The energy requirements for operating the water recycling processes and long-distance pumping on a scale of 30 ML every day are unacceptably large. It appears that further energy will be squandered every day by pumping this water to and from the Havant Thicket Reservoir as an environmental buffer.<br>It seems most unlikely that net zero could ever be achieved in its operations by the company.<br><br>2. Alternatives have been ignored or dismissed unreasonably. More emphasis should be placed on reducing leakage in the water supply network and restricting water usage by the public.<br>More sustainable options have been ignored, such as moving the abstraction points further down the Rivers Test and Itchen, making greater use of existing rainwater by constructing additional winter storage reservoirs and/or making greater use of aquifer storage.<br>Even if wastewater recycling were to be considered to be necessary, considerable reductions in cost and energy consumption could be achieved by using the output of waste water treatment plants closer to the areas where the potable water is needed, e.g. by utilising the output from the [redacted] WWTW or Winchester WWTW.<br><br>3. I am most concerned at the environmental damage that would be caused by routing a major pipeline for more than 40 km across southern Hampshire. Habitat connectivity would be disrupted in the long term by cutting a 50 m swathe through hedges and tree lines. Good connectivity is essential for many protected species, including rare bats, that are unable to cross such wide habitat gaps. Disruption on this scale implies loss of alternative routes. Adequate hedgerow and tree restoration would take decades to become effective.<br>Furthermore, I am most sympathetic to the disruption and loss that the pipeline route would cause to landowners.<br>While I am keen to avoid water abstraction from chalk streams such as the Rivers Test and Itchen, that does not justify extensive habitat destruction elsewhere. I note that the Southern Water proposal does not refer to reduction of water abstraction from the catchments of other chalk streams such as the Rivers Meon and Ems.<br><br>4. Danger of environmental contamination. The site at Broadmarsh, Havant that is being proposed for the recycling plant is unstable contaminated reclaimed land. Disturbance of this for pipelines and buildings risks contamination of groundwater and Langstone Harbour. | Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>1. Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated except if the land is needed permamently for environmental mitigation or for other uses. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. For more details on the environmental impacts of our WRMP please refer to the updated Annexes 17, 18 and 19 of our fdWRMP24.These annexes contain the SEA, HRA and WFD assessments respectively. |

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| | 5. I am concerned at the lack of assessment of the environmental impacts of the discharge of the reject stream from the recycling process via the long sea outfall from [redacted] into the Solent. For example, the discharge is likely to contain anti-fouling treatments used for maintenance of the reverse osmosis membranes and other unassessed chemicals.<br><br>6. Southern Water have demonstrated that they are unable to operate a wastewater recycling plant to an acceptable standard.<br>In January 2023, I toured the pilot recycling plant that was operated by Southern Water at [redacted] in Havant and have subsequently examined the report on its operation (Lab_data_summmary_26Aug24_BuddsFarm (002) redacted.xlsx) that was released recently. I have a good understanding of the scientific principles involved and am most concerned at the poor standard of many parameters of the product stream listed as 'Budds Pilot UVAOP effluent'. Most strikingly, in the Biological Indicator category, unacceptable levels of bacteria were present, including non-lactose fermenting bacteria and Pseudomonas aeruginosa. As the membrane systems should be designed to retain much smaller particles, this data suggests total failure of the processing. | Building on former landfill sites is not unusual. When done with proper management and compliance with regulations and ensuring environmental safeguards are in place building on former landfill sites is both feasible and safe and is increasingly an important tool in sustainable development,<br><br>Southern Water has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill, including in respect of piling down to chalk. Works interacting with the landfill are expected to require an environmental permit, which provides an additional layer of protection and control in relation to those works.<br><br>We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response.<br><br>All of the hormones tested in the trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre). |
| WRMP843 | This response is purely concerned with Southern Water's proposal to recycle effluent from [redacted] Sewage Works and use the Havant Thicket Reservoir as a 'buffer lake.' It is this aspect of Southern Water's plan which is of most concern to local residents.<br><br>Overall view<br><br>The original planning consent at Havant Thicket was for Portsmouth Water to provide a unique chalk-spring-fed reservoir. Despite widespread concern at the environmental damage caused by construction of a reservoir, it was generally accepted locally. SW now proposes to mix the spring water with recycled effluent from [redacted] Sewage Works. This very significant change in the role of the reservoir is unacceptable except as a very last resort. The recycling scheme should not be approved by the Secretary of State until all other options have been fully explored.<br><br>Specific comments | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO application will seek to change the operational use of the reservoir and related works so that they can store and convey the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |

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| | We are disappointed that SW is promoting such an expensive solution to the predicted need for extra water, involving major new infrastructure and heavy use of chemicals in the reverse osmosis process. We are not convinced that alternative, less ambitious and more sustainable, solutions have been properly explored. These could include storage options such as more small reservoirs, aquifers, wetlands, tanks and butts. Dispersed storage would place supply closer to demand and reduce the need for such a massive pipework network.<br><br>We are concerned that the effect of recycled effluent on biodiversity in the reservoir has not yet been fully understood. The same appears to be true for the effect of the piling for installation of the recycling plant on a derelict industrial landfill site, and the concentrated discharges from the recycling plant into the heavily protected Solent.<br><br>The proposal risks turning people away from tap water towards bottled water due to the lack of trust in the water companies – SW in particular – creating a new plastic bottle mountain, especially as mixed reservoir water will taste different to spring water.<br><br>As customers of Portsmouth Water, Emsworth residents will receive water from the reservoir in times of drought or emergency, with more routine supply planned after 2040. It is unacceptable that all parties affected have not been contacted directly as part of this consultation. | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. As part of our drive to encourage more storage of rainwater locally and close to where it falls we have set up the Clean Rivers and Seas Task Force - Southern Water<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. Regarding effects of recycled water on local ecology, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. Regarding accumulation of substances in Havant Thicket reservoir sediments, the advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br><br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP844 | We definitely disagree with the proposals in Southern Water's plans for the next five years.<br><br>Southern Water made a material change in their plans from desalination to effluent recycling since the last plan was issued but they did not carry out a full review or undertake a statutory consultation. This, together with limited consultation, is really unacceptable. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management |

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| | There are a range of issues which need addressing: pollution in our rivers and harbours, flood risks, leaking pipes, over extraction from our precious chalk streams and over consumption of water generally.<br><br>These require an overall plan which is based on sustainability and protection of the environment. We do not need expensive solutions like water recycling; there are plenty of other options which work with nature and do not threaten our local waterways.<br><br>Southern Water's current plans are both expensive and carbon intensive and do not offer the kind of protection we would expect to see for our local environment.<br>At the moment, our water is wasted both by leaking pipes and failure to store winter rain. It is also wasted because people are not encouraged to save water. Smart meters and better use of grey water would both prevent the need for expensive solutions like the plans for water recycling.<br><br>We recognise that there may be times when water is in short supply but really believe that a better option is storing winter rainfall which is predicted to increase according to most climate scientists.<br><br>We believe that most winter rain is wasted at present and also that Southern Water is over estimating its projection of population growth and these figures need careful monitoring.<br><br>We currently only collect about 1% of the rain which falls in the UK and this could be stored in ways that would prevent flooding. Also, at the moment Southern Water's record on reducing leakage is poor and needs to be much more ambitious. More than 100 million litres of water are lost every day and they should be delivering a much faster program of renewing pipe networks. Having a replacement rate of just one in 1,000 years when the water main is only designed to last a hundred and twenty years is unacceptable.<br>We are particularly opposed to the plans for water recycling at Broadmarsh in Havant for the following reasons:<br><br>1. This is an unnecessarily expensive and carbon intensive project. It would be much cheaper to look at ways of storing winter rainfall. The predicted cost is £1.2b and this money could be much better spent. We also need a strategy which prioritizes low energy solutions. The energy alone for the Hampshire scheme will cost more than £3 million a year to run and then pipe the water to [redacted]. This is surely an unnecessarily expensive drought resource.<br><br>2. The nature of the reverse osmosis process means that it is required to run continuously. In Havant's case this will produce 30 Mld of water 365 days a year to avoid damage to membranes pipes and pumps. Many people have grave concerns about Southern Water's ability to maintain this without causing pollution.<br><br>3. This plan will have negative environmental impacts around Langstone Harbour, the Solent, Havant Thicket Reservoir and the pipeline route. We are particularly concerned about the waste | Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br><br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding population growth, for dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled |

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| | material from the treatment process being discharged into the sea with its likely concentration of pesticides, pharmaceuticals, forever chemicals and chemical disinfection products.<br><br>4. It seems that no independent monitoring of the discharge into the reservoir is planned.<br><br>5. We are losing a unique biodiversity opportunity to create a chalk spring fed Reservoir which is what local people were promised when the Havant thicket Reservoir was approved<br><br>6. The proposed site at Broadmarsh is on a landfill site, full of contaminants and very close to the sea. The plant will require deep piling and tunnelling and is so is likely to release toxic leachate into the harbour. It will also have a significant of visual impact on the coast.<br><br>7. We do not understand why the option of recycling effluent at [redacted] has been shelved. As this would be nearer to where the water is needed.<br><br>8. Southern Water seems not to have considered (or put forward to the Environment Agency), alternatives like winter storage. A full review of options should be a matter of urgency. Solutions like small storage areas and moving abstraction from the chalk streams to near the tidal limit could be implemented very rapidly. So could the construction of new reservoirs such as the river Adur offline reservoir in West Sussex<br><br>9. Not only were alternative schemes not considered but Southern Water unnecessary withheld 12 volumes from public view so we have been unable to see useful details on options appraising and environmental assessments.<br><br>10. We are concerned about the cost of the water recycling process and the effect on consumer bills. We are told that the recycling scheme alone will deliver a profit of about 45 million pounds to Southern Water. This kind of profiteering at the expense of customers is unacceptable.<br><br>11. We are also concerned about the quality of the water we will be expected to drink. We fear that many people will refuse to drink tap water and we will be presented with even greater problems from plastic bottles.<br><br>12. We also find it hard to understand the need for this water. Havant Thicket Reservoir is designed to cope with a 1 in 200 year drought (which has not yet occurred) and so surely other measures like reducing use per head, storing rain and fixing leaks would give a good safety margin<br><br>As a group, we are strongly hoping that these misguided plans will not be allowed to go ahead. | us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>1. Points 1,2. Water recycling inevitably uses more energy and is subsequently more costly to operate than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>2. Point 3. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Point 4. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Point 5. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>3. Point 6. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques |

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| | | will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Point 7. Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>4. Point 8. Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>5. Point 9. Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or ‘the Act’ (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are |

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| | | making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>6. Point 10. The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>7. Point 11. Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Point 12. All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience |

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| | | options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29. |
| WRMP845 | For the attention of DEFRA<br><br>I am writing to object to Southern Water's revised draft Water Resources Management Plan for the flowing reasons: -<br><br>It is inconceivable to me that Southern Water (SW) should consider mixing recycled effluent with the chalk spring supplying the Havant Thicket reservoir. Why should customers be forced to: -<br>• Drink this product?<br>• Pay the additional costs of building a complex high-risk system and the costs to run it?<br><br>This project is supposed to be a drought resource which would only be needed in times of extreme water shortage. However, to maintain readiness for an emergency the pipes and filter membranes will have to operate continuously every day at the optimal operating condition. To do this SW will need to process and pump around it's system a volume equivalent of 12 Olympic size pools of water a day. It is understood the energy cost alone would be £3 million pounds per year in a normal year (i.e. not in a drought).<br><br>Despite the complexity of the new treatment process, which is new to the UK, and the risks to the reservoir if SW fail to maintain the treatment plant, no independent monitoring is proposed.<br><br>Money invested in effluent recycling becomes redundant when the plant comes to the end of its life in in approximately 60 years time. Upgrades and replacement of electrical & mechanical plant are needed every 10 to 20 years. Whereas a winter water storage solution, such as a reservoir, works with climate change and will still be in there in 200 years time. A reservoir solution also provides better value for money and more environmental benefits, as well as potential benefits to reduce winter flooding.<br><br>I have concerns about the impact of more concentrated reject water from the effluent recycling process being discharged in to the Solent via the existing Eastney Long Sea Outfall. The SW assessment indicates a 'likely significant effect' in their Preliminary Environmental Information Report published with the consultation. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We consider all options as part of our options appraisal process. The scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>- The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>- The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Water recycling inevitably uses more energy and is subsequently more expensive to operate than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. The water recycling plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the |

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| | Also I am concerned at the significant risk of leachate and landfill gas being mobilised by piling and tunnelling, required to build the recycling plant, through the waste into the chalk aquifer below – groundwater flow in the aquifer is to the south (i.e. flowing towards Langstone Harbour).<br><br>It is a retrograde step to drive people away from tap water to bottled water. In California and Singapore water recycling is used and many people have changed to using bottled water.<br><br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling scheme.<br><br>The company is allowed to make a profit from building the new infrastructure. There is real concern that rejection and selection of water resource options is being driven by the search for profit, as the current funding mechanism incentivises water companies to develop infrastructure heavy solutions like effluent recycling, which allow them to make more profit, rather than developing more sustainable solutions.<br><br>SW should actively investigate more viable alternative solutions. England receives plentiful rainfall and SW should consider storing this in additional reservoirs which would cost less to build, less to maintain, uses low risk technology and have a lifetime of hundreds of years.<br><br>This proposal by SW is indicative of a company driven by profit with no regard to how it treats its' customers, the environment, or future generations.<br><br>Regards | treatable parameters. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10-20 years of the electrical and mechanical plant.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We note your concerns about the reject water and A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP846 | Objections to Southern Water Resources Management Plan Consultation (Southern Water) Dear Sir, This letter contains our objections to Southern Water's recycling treated effluent proposals. This is a money-making scheme for a private company that, if you agree to it in any shape or form, will make the UK Government, funded by the tax-payer and UK water consumers, a 'cash cow' for Southern Water and its owners. Please do not accept the company's bogus claims that we need this grossly expensive project. For brevity's sake we have selected those objections that, for us, are the most outrageous.<br><br>1. It is untrue that UK's southern region is facing drought conditions and shocking that Southern Water uses this in its public literature in order to justify its plans. As outdoor enthusiasts, for decades we have always monitored the weather systems; in our respective lifetimes in this country if there are any noticeable weather changes these are towards increasingly wetter and more violent weather events. The UK's Met Office, which has behaved more reliably than most if not all of England's now notorious privatise water companies, reports that the UK is getting more rain on average over the year, and 5 of the 10 wettes 21st UK years since 1836 have occurred in the century; climate scientists acknowledge that this is caused by the now recognized climate change reality. Is Defra aware that only 1% of UK rainfall is harvested? So why did our elected Governments' regulatory body, Defra, not act from the outset of privatisation in 1989 to enforce Southern Water to address the network's infrastructure requirements, namely pipe repair or replacement, work for which the company had been paid handsomely at the outset of privatisation to undertake? On this topic is Defra aware that over 100 million litres of our valuable water is lost daily because of Southern Water's leaky pipework that even water inspectors, over decades, have reported is neither repaired nor replaced. Does Defra not know that Southern Water's replacement plan of 1 in a 1000 years, when a water main is designed to last 120 years, is simply unacceptable? Why was Southern Water not monitored so as to ensure the use of consumers' payments to carry out this essential work? Instead, journalists have publicly flagged up the company's continued profiteering for its staff | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see here.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | and shareholders. As an ordinary citizen I don't expect bonuses or profits whilst a company's essentia investments need to be made. Yet Ofwat's web page claims that a "regulatory framework was put in place with the goal of ensuring customers receive high standards of service at a fair price". In that case, Ofwat has signally failed to comply with that framework: unfortunately we cannot trust such a "regulator" to regulate Southern Water and it follows that we certainly can't expect that company to undertake the even more sophisticated project of recycling treated effluen Highly relevant to that point is that the public also routinely suffer failing pumping stations under Southern Water's management, for which sometimes 20 lorry-loads of effluent must be driven along our roads – for which we also pay taxes – for disposal. We all know that Southern Water uses our shoreline as its own toilet because it has also failed to keep up with the population growth at any stage by also failing to build increased sewage holding tanks. Of course that would deprive its shareholders and CEOs of profit. As stated, our "regulatory bodies" don't do their job of holding Southern Water to account. It is supremely ironic not to mention insulting to the general public's level of intelligence that Southern Water propose building a highly complex pipework, which we are supposed to trust them not only to tunnel and build correctly, but also to maintain! Given their track record this is the height of absurdity and, if it gets through, our Government will be a laughing stock and the target of yet more 'enterprising' internationa asset companies. The public cynically realise that this is precisely why Southern Water bosses have succeeded in claiming 'national infrastructure need': by this means they jump local authority's – and its public's – scrutiny. But it's still our money and our lives will be at risk.<br><br>2. Please uphold your Government's claims to seek environmental and truly cost-effective and genuinely sustainable solutions for the UK. Storage options must and can be developed far more cheaply, quickly and economically. One example: there are already natural aquifers in our region which will store precious rainwater. So doing prioritises low energy, reduced carbon and emissions for our country. The company's shareholders are not those whose families also live here: we must protect Havant's vital numerous natural springs which constantly feed us, our streams and rivers. Southern Water must not be allowed anywhere near them or we will lose one of our region's irreplaceable assets: or perhaps the company hopes its pipework will actually permanently damage our natural springs – leaving us at the mercy of ever spiralling water costs which the Government, through the consumer, must endlessly pay shareholders. Did you know that this Hampshire and Littlehampton effluent recycling schemes have the highest environmental impact score of any of the options considered yet not publicised? We trust that you know that 3 new reservoirs, a proven environmental development that will last for generations, can be built in our region for the current £350 million cost of the treated effluent scheme: of course we all know that the latter's cost will rise exponentially and, together with any/all problems along the way, simply require the guarantor Government and its tax-payers to pay for. We cannot trust Southern Water and we've bailed them out too many times. Even Moody's recently declared Southern Water's loan as 'junk'. The Government must cut its losses and not service Macquarie, the majority shareholder, which may do for the company, once this plan is put through, what it did for Thames Water: and the public definitely won't forget who signed it off. We know that the Government has guaranteed a 3.75% return on the capital | Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the pursuit of profit, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding the suggestion that three reservoirs could be built for the cost of Broadmarsh ERP, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | expenditure investment so the company can make £45 million out of it – at our expense for this totally unnecessary and environmentally damaging project.<br><br>3. Southern Water must also protect our rivers. This can quickly be done by moving abstraction boreholes down the catchment, and river abstractions closer to the tidal limit. It is not true that the treated efflue plan will reduce the need for river abstraction – the company must be challenged by you the regulator together with the Government, to make such changes now. For an example, the United Kingdom Technical Advisory Group Report on Environmental Standards and Conditions (2008), would allow up to 50% of the 95 percentile flow to be taken from the tidal limit. This is a far more cost-effective, earlier, practica approach. We absolutely must stop rewarding water companies for abusing our natural water systems whether fresh water or marine.<br><br>4. Another blatant absurdity is the plan to build any industrial plant, particularly this plan's, on a 13 metre deep, old, contaminated landfill site, immediately adjacent to Langstone Harbour whose environmental and ecological value are internationally recognized as needing protection. It beggars belief that Southern Water has so little regard for Langstone Harbour and the public and wildlife who use and cherish it, that our harbour - and probably also Chichester Harbour into which Langstone Harbour flows - will be the ongoing and endless recipient of whatever contaminants leach out of the site following the company's securing the plant on the landfill. Let's not pretend that we trust Southern Water to prevent this from happening. Southern Water also plan to extend its new pipework from [redacted] and thence through Havant's underground channels miles to the new Havant Thicket reservoir, which was never intended to take Southern Water's treated effluent; that treatment entirely dependent on a non-stop – i.e. regardless of ongoing or heavy rainfall - filtering through membranes that must be maintained 24/7, 365 days/year. This cost alone without inflation will cost £3 million. If this company cannot even be bothered to repair/maintain existing basic pipework, how will it manage this level of sophistication? The effluent must flow and how long before it escapes en route to the reservoir as a pipe fractures, membranes break up, mounting costs cause the public to refuse payments? Will the Government, the tax-payer have to clean up? What of the natural springs, damaged by this subterranean pipework, they will be irreparable. Is Defra aware of Langstone and Chichester Harbours' international and national accolades for their natural – not man-made – properties that are of huge ecological and environmental value to all our wildlife and seas? It is impossible for Southern Water to maintain any credibility of environmental respect whilst continually discharging not only sewage, as a direct result of its failure to build additional sewage holding tanks, but also inevitably leaching highly polluting contaminants into those harbours as a direct result of building on the landfill site on Broadmarsh, the site of a Coastal Park no less. This is a further example of this company's cavalier attitude to England's irreplaceable natural habitat and ecology.<br><br>5. Open criticism of Southern Water's absurd scheme appears to have made it suggest a fall-back positio in the event that its elaborate plans in any way fail. England, internationally recognized as a wet country that experiences regular wet weather, would become the recipient of water tankers from Norway if Southern Water's plans are botched or fail and our natural | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Sea tankering from Norway is no longer included in our plan. |

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| | water courses damaged. Surely there can be no reason whatsoever for such a hopelessly conceived plan. Our Government cannot allow it on the basis of its unenvironmental cost alone, quite apart from the untruth that we need its plan as told by Southern Water, and its shocking neglect of its duties to date.<br><br>6. It is also interesting to note that Southern Water's own acknowledgement that this scheme is used in Singapore and California fails to also make clear that its product, the treated effluent water, is then used in industrial manufacturing. The public, and perhaps the Government too, are not being told the full story; as with any major public relations exercise, we are being sold what the beneficiaries want us to believe namely that which is in their interests and not ours. It is also worth pointing out that we cannot even manage our nation's own mounting waste, particularly plastics which are permanently polluting our own waters and marine life on which we depend. If the public vote with their feet and turn their back on drinking treated effluent by buying endless plastic bottled water, who will be the losers? The Government needs to take a robust stance towards this completely unnecessary but hugely expensive project that we might assume stems from an Asset Management driven Southern Water. Please put our national resources, including our people, first. We neither want nor, importantly, need this dangerous scheme. Instead, please urgently require Southern Water to use known sustainable methods of water collection, abstraction and use. Please reject permanently Southern Water's treated effluent schemes. | |
| WRMP847 | Re : SOUTHERN WATER WRMP<br><br>Date 3 Dec 2024<br><br>Dear Sir<br><br>With ref to the Southern Water WRMP with Hampshire Water Transfer and Water Recycling Project<br><br>To the best of my knowledge my comments on the above are as follow:-<br><br>In the Havant and surrounding area, our drinking water is supply from Portsmouth Water and it comes from two sources, approx.85% comes directly from groundwater source i.e. boreholes or springs, with the remaining 15% being derived from the River Itchen - itself being groundwater fed. The water is classed as " good quality " therefore requiring only minimal low cost conventional treatment and pumping costs.<br><br>Some years ago, due to predicted increase in population (and now also climate change), a reservoir was planned, permission given by Havant BC, and constructed now started by and on land owned by Southern Water, for the Havant Thicket Reservoir at Rowlands Castle.<br><br>I am lead to believe that the original design and intent, was for the reservoir to receive and for storage of "good quality" excess water from ground water sources, especially in the winter, which would other wise flow into the sea. The water would be drawn from the reservoir, treated | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies.<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We |

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| | and pumped into supply in peak demands periods and the summer for the local area, using only minimal low cost conventional treatments and pumping costs. This original scheme would have also reduced water abstraction from the River Itchen . The water demand in the area would also be reduced further by installing water meters for customers and reducing leaks.<br><br>However the Southern Water proposal now is to also feed treated effluent from Havant Sewage Treatment Works "toilet-to-tap" systems to the Havant Thicket Reservoir.<br><br>The justification given, that the additional water can also serve other supply areas e.g. to [redacted] etc.<br><br>This "toilet-to-tap" systems proposal will involve additional treatment and transfer pumping costs with possible drinking water quality issues for customers.<br><br>Apparently due to the very high cost of the recycled water process, it has only been used in countries with very low rain fall, that have areas that have severe drought, or the risk of loss of all their water sources.<br><br>Recycled water to provide drinking water has been used in Singapore, Namibia, Australia and several locations in the USA. The UK is not classed as having a low rain fall and has in fact been experiencing higher than average with flooding. To the best of my knowledge there is no need for, and no actual “toilet-to-tap”schemes that supply domestic customers in the UK.<br><br>The recycled water process proposed is a complex high cost treatment process requiring all associated ICA ,Telemetry, SCAD and standby systems, to meet and maintain the required water and safety standards.<br><br>All civil structures including flood defences, infrastructure, process plant and pumping stations have a very high initial, operating, repair and replacement cost.<br><br>Whole Life Costing for the proposed scheme with any alternative options e.g storage, boreholes etc in the [redacted] area etc, do not appear to have been provided for comparison or to substantiate the scheme.<br><br>Conclusions<br><br>To the best of my knowledge and information available my conclusions are :-<br><br>1. There are no Water Companies in the UK that use direct “toilet-to-tap”schemes to supply domestic customers in the UK.<br><br>2. The quality of water supplied to Portsmouth water customers will change from “good quality” raw water with simple well established treatment and disinfection. | are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We have not conducted a HAZOP on this design as it was a reference design with the aim to use data generated from the pilot trial to assess the footprint of the full scale plant. HAZOP studies are not used for blending different water types. We have however assessed our design using the Structured What-If Technique (SWIFT) to ensure we had included the required number of process units, including redundancy, in case of operational challenges. The SWIFT exercise uses all the general principles that underpin a HAZOP study and is used when a design is at a preliminary stage. A HAZOP is generally conducted at the detailed design stage to ensure the appropriate number of process units, fail safe systems and controls are included to run the asset. This will be required to be conducted by the competitively appointed provider (CAP) of the project. Specifically to the blending of different types of water, we have used a water quality model to ascertain that the resultant water quality is not corrosive to the distribution network downstream.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>With regard to effects of long term consumption, Southern Water must comply with stringent standards established by our regulators which take such evidence into account, the Drinking Water Inspectorate (DWI) would be able to provide further detail. For more information about the DWI and how it regulates the quality of drinking water, please visit the government website https://dwi.gov.uk/<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing HWTWRP, which will be highest in the first half of AMP8. |

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| | To a “poor quality” raw water with complex treatment with unconventional disinfectant .<br><br>Then blending with an unknown ratio of “good quality” raw water, with further treatment. It is not know if a hazard and operability study (HAZOP) has been carried out.<br><br>3. The effect of long term consumption of effluent recycled water is unknown<br><br>4. Whole Life Costing for the proposed scheme and any alternative options for comparison is unknown.<br><br>5. What has been proposed, is that customers bills will increase to finance the scheme, with an indication of the rise of the average water bill in the first year, from £111 to £129 (excluding inflation) and would then remain high .<br><br>From the above I do not support the Southern Water WRMP with the Hampshire Water Transfer and Water Recycling Project. I believe that this project should be scrapped and revert back to the original design and intent of the Havant Thicket Reservoir at Rowlands Castle.<br><br>On any scheme for peaks demands, water meter should be the first considered with provision of local storage and boreholes, to avoid high transfer pumping costs.<br><br>Kind regards | |
| WRMP848 | Attention: DEFRA’s Consultation on the Hampshire Water Transfer and Water Recycling Project<br><br>We at SOSCA wish to express our very strongly held objections to the whole of this project. It is a most unnecessary, unsustainable, environmentally damaging, extremely costly, scheme that has many defects, viz:<br><br>Lack of TRUST on many levels -<br>In the skill set ability of Southern Water to monitor and maintain a hugely costly, complicated, energy demanding, environmentally damaging, infrastructure project of ‘reverse osmosis’ that has never been used before in the UK to provide its customers with the crucial life sustaining product of their drinking water.<br><br>Despite Southern Water’s corporate declarations of protecting the environment here are some examples that illustrate the opposite:<br>• It was fined £126 million in 2019 for unlawful discharges<br>• It was fined £91 million in fines for widespread pollution after pleading guilty to 51 offences in 2021 | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | • It was fined £330,000 for faulty equipment of a pumping station that killed 2000 fish in 2024<br>• It was fined £31.9 million as a performance penalty for 2024<br><br>Part of the huge costly infrastructure requires that an old infill site at Broadmarsh will require the drilling for tunnel shafts and laying of huge pipes which will impact the following:<br>• This site has no engineered foundations.<br>• Has been poorly monitored.<br>• Is abutting the shoreline of Langstone Harbour with which is already suffering from coastal erosion.<br>• Will leach highly toxic chemicals directly into the protected Harbour.<br>• Will emit methane across a densely populated industrial site.<br>• Has no published policy in the disposal of the contents of the site<br>• And sits upon a Flood Zone<br><br>Damage to the ENVIRONMENT<br>This infrastructure requires several new pumping stations. And yet there were serious failures at [redacted] and Hardam that required the distribution of bottled water to the communities.<br>There were recent trials of 'reverse osmosis' held at Havant and [redacted] the results of which raised serious doubts on the ability of Southern Water to remove unexpected contaminants.<br>The research into the trials produced a long list of failed contaminants.<br>There also appeared to be no testing for Micro and Nano plastics. A huge concern for not only the health of the entire customer base but also for the wider ecological world.<br>It appears, though kept from the public domain, that the effluent recycling trials at Sandown failed to comply with the Water Framework Directive.<br>The recycling schemes at Havant and Littlehampton have the highest NEGATIVE environment impact scores of any other options considered.<br><br>Environment Agency: "Southern Water has a responsibility to operate in accordance with permit conditions and protect against serious pollution. In its deliberate, widespread and repeated offending, it has failed the environment."<br>Southern Water was considered one of the worst performers for the fourth year in a row for customer satisfaction……..<br>Sec of State, Steve Reed: "on years of pollution and underinvestment leaving our waterways in a perilous state. The public deserves better."<br><br>Lack of corporate diligence in researching ALTERNATIVE methods which would cancel the necessity for this hugely expensive recycling project<br>8.4 trillion litres of water fall every year across the customer base of Southern Water and Portsmouth Water. Yet these companies treat and supply just 242 billion litres annually, using only 2.8% of available rainfall. Climate agencies forecast our winters to grow wetter which will make the UK even richer in rainwater. The obvious course of action is STORAGE and to HALT LEAKAGE | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>Regarding the suggestion that several reservoirs could be built for the cost of Broadmarsh ERP, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more |

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| | • More than 100 million litres of precious water is lost every day by Southern Water<br>• Why should there be any necessity for Southern Water to use and undermine the spring fed new Thicket Reservoir<br>• Why has Southern Water ignored the possibilities of storing excess rainfall in aquifers .<br>• Why has Southern Water because it failed to think ahead and invest in new reservoirs even considering the take over of Portsmouth Water's corporate investment.<br>• Why does Southern Water not prioritise the reduction of leakage from pipes which could reach a 50% reduction by 2040 instead of their declared plans to cut just 53% by 2050. (Whilst most of the present pipes are old they could be reused by the insertion of sleeves).<br>• Why does Southern Water continue the abstraction and damage to our nationally fragile chalk streams by not abstracting from nearer the tidal limit.<br>• Why has Southern Water not invested in forms of underground storage.<br><br>The final FINANCIAL COSTING for the entire project is UNSUSTAINABLE and UNNECESSARY<br>The basic product of this industry is rainwater - which is FREE. When the companies were privatised they were debt free.<br><br>• Havant Thicket Reservoir already has planning permission and is being constructed for approximately £350 million<br>• Southern Water could build 16 aquifer storage schemes for approximately £374.56 million<br>• Southern Water have quoted a price of £1.2 billion for this infrastructure and with piping costs would come to £1.4billion.<br>• Southern Water could build several reservoirs for the cost of this first level of forecast figures<br>• This costing is unrealistic because it is taken from today's pricing whereas they ignore the costs which they would incur in the future when a) they actually commence work and b) their year on year maintenance costs and c) for any malfunctions.<br><br>Macquarie own Southern Water, they were the owners of Thames Water during its demise. Neither company had any debt in 2017.<br>Moody's have now classified their bonds as 'junk' leaving their 4 billion loan requirement at a 10% interest rate.<br>Servicing this debt would be close to 50% of their revenue.<br>The current Ofwat rules would also guarantee SW a return on investment of approximately £45million on their £1.2billion proposed investment of the reservoir which is the driving force thus neutralising the very genuine and moral concerns expressed by the public. .<br>There should be an independent cost analysis of this entire project and compared against the alternatives. | challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Notwithstanding the fact that these 16 schemes are not explicitly identified in this query, there is little benefit in developing 16 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties |

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| | The corporate culture at Southern Water continues to concern its customer base with its claims and actions<br>The key promotional point that Southern Water uses to advance its argument for the 'reverse osmosis' process is that it is used widely across several countries which is actually spurious and unsubstantiated. When in fact:<br><br>• The main usage is for industrial and farming industries<br>• The claim it is for human consumption is not verified.<br>• The countries where it is used the communities resort to bottled water<br>• They conducted public consultations where their format for questions were geared towards favourable responses which were false but which they then proclaimed as 'widely held support' for this project.<br>• They did not inform or engage right across the Portsmouth Water customer base to engage with them in these consultations.<br>• Their statistics for population growth are puzzling and geared towards a favourable outcome for their project.<br>• It has ignored the engagement of its customer base over alternative solutions by declaring the 'reverse osmosis' as the 'preferred option' as if it were a foregone conclusion.<br>• They claim that the customer consultations view effluent recycling comparable to storage in aquifers.<br><br>It is difficult to equate one of the Prime Minister's 5 national missions, - 'to make Britain a clean energy superpower with zero carbon electricity by 2030, and accelerating our journey to net zero' – when the energy requirements year on year for this project together with its carbon emissions will far exceed the government's mission statement.<br><br>It is time this entire project was researched by independent consultants with their results made available to the public and for them to provide an honest Cost Benefit Analysis. | and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |
| WRMP849 | Dear Defra,<br><br>I am writing to you to request that you again reject the new plans of Southern Water , particularly the plans that include recycling effluent in providing a water supply to their customers , This would include me as both a Portsmouth Water and Southern Water customer. The plan seems a rehash of their previous plan and does not tackle the real concerns of the people of this area. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company |

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| | I personally believe that Southern Water are again prioritising profit in their plans rather than turning around the serious quality issues they have shown to have currently.<br>I also believe their plans include 'tankering' around considerable amounts of water to ensure an adequate supply which surely must strike anyone as a less-than-ideal solution. Particularly when trying to minimise environmental impacts, Surely this aspect must be a test of Southern Water's plans.<br><br>In the UK there is a well-known lack of building for the future; while profiting in the current and I can see just more of this in future if no one takes proper charge of the strategies employed here.<br>Surely instead of using effluents, rainwater, which we get in plentiful supply, would be a far better solution.<br>Again, our current incumbents have not invested enough in building reservoirs or tackling wastewater effectively in our aging infrastructure.<br><br>This all shouts to me a lack of leadership at both these companies and worryingly, in our own government and regulator. Why do I say that ?, Southern Water has repeatedly presented this appalling plan over a significant period of time, and it is yet to be fully rejected despite plenty of objections from our local folks. Are we to be ignored in the striving for profit ? . Surely with the new government and a more balanced view of what is important here will prevail and if the companies do not do the right thing, then Defra should consider significant action to protect all UK supplies from these grubby companies. Allowing these companies to continue making the rules is not working.<br><br>This is hugely important for our futures and monetising our water supply is simply the wrong thing to continue. Let's take it back and make it better.<br><br>Yours sincerely, | can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP850 | To all concerned,<br><br>Please add my household to the list of concerned residents about Southern Waters proposal for Effluent Water Recycling in the Havant Area.<br><br>We have plenty of rainfall and local springs to draw from and should not require this extreme technology in a country such as ours. I have family in Greece where it is regularly near 40'c and they manage effectively, why can't we?<br><br>I do not trust Southern Water with this technology given their poor track record. As a regular cold water swimmer I used to use the BeachBuoy app to identify when there has been a | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | sewage discharge. Unfortunately along this stretch of cost this is such a regular occurrence that I have now abandoned my swimming here, it seems that they just don't care.<br><br>During the consultation in the Meridian Centre a few months ago I raised that the design of the pipe systems needs to be so that it is physically impossible for any raw sewage to end up in the new Havant Thicket reservoir. Again, I do not trust Southern Water to make that happen given the regular spillages into the sea. | No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Reservoirs are a good method of capturing rainfall and/or spring water however, require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP851 | Dear Sir or Madam,<br><br>I would like to express my opposition to the proposal by Southern Water to use reverse osmosis as a means to supplement the new Havant Thicket reservoir. This country receives plenty of rainfall and only a fraction of it is used for drinking water. The capital and running costs of the project will be huge, not to mention the energy needed to operate the RO plant. There must be a better way to provide the future reliability of drinking water that we need.<br><br>Yours sincerely | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Our supply area is classed as being under 'serious water stress' by the Environment Agency.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |
| WRMP852 | SOUTHERN WATER EFFLUENT RECYCLING PROJECT<br><br>I object to the entire concept of what Southern Water are proposing on the following grounds:<br>I am appalled by the obvious financial gains the company will accrue as a result of this project and bearing in mind who own SW now and watching the fall of Thames Water, I feel aggrieved that the same fate of asset stripping is being virtually forced on our water supplies in Hampshire and Surrey. Profits are being removed to shareholders while the system is falling apart and even their proposed solution will benefit shareholders to the detriment of consumers.<br>My grounds for objection go far beyond the obvious financial gains for SW, although that in itself is abhorrent considering the appalling track record of maintenance that SW carry out on their supply chain. The environmental damage that could ensue and will continue under these plans | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

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| | is unforgivable in this day and age and no company should be allowed the power to withhold, change or subvert any surveys, studies or information that may not fall in the desired direction that company wants to achieve. The fact that SW did not carry out a full review of its options as 'a full re-appraisal exercise was not considered time or cost beneficial" speaks volumes and the fact that they have suppressed 12 volumes of the project from public access online shows they have information that could compromise their case and therefore needs to be kept to minimum access(in person only at SW HQ).<br>I therefore list my more detailed objections here. I may not have fully listed everything, but make no mistake, I object to the whole proposal and support the rejection of this project as it stands.<br>SW should be legislated to provide a full environmental assessment which could be independently verified for accuracy and include alternatives which are completed fully. SW should be directed to commence any works already authorised that are being held back currently which are not connected to the project currently.<br>Currently it seems only about 1% of rainwater is being collected for use across the UK. With the levels of rainfall experienced countrywide, SW should be looking at sustainable solutions that work alongside climate change. To this end, why have SW completely disregarded the aquifer storage sites in Hampshire and probably West Sussex that have already been identified, along with burying these options in their vast number of files. This option should be investigated as a priority and indeed Dorset are already running aquifer storage successfully so not a million miles away is the proof it works.<br>The rivers are suffering lack of water, why are the borehole abstraction sites not being moved further downstream in the rivers? Research shows this would have an almost immediate beneficial effect as the levels would rise. Siting these near tidal limits would ensure full access without any impact further upstream. SW know this but have chosen not to even look at this, alongside the option of storage reservoirs for the Hamble, Wallington and Adur which have not been prioritised. The Test aquifer is now mooted for 2041/42. Why the delay? These storage solutions are clearly a way forward, yet SW are passing over these options totally. SW should be looking at winter gain, summer use, sites across the whole area that they cover. They have stated they will look at these options (but not until after their intended plan is accepted).<br>This is not just about the effluent scheme, it is a massive issue when it appears a private company can obliterate and bury any environmental concerns without any regard for the real owners of the land, ie us, the people on the ground. The company don't own the water, this is a public service and should be scrutinised to within an inch of its life to ensure VFM and sustainability is being achieved. Plus, this is a once in a lifetime opportunity to get it right for the foreseeable future.<br>SW have pushed back on any aquifer works or studies for the ten years 2025 to 2035. That will ensure when the time comes for a final Development Consent Order, SW will truthfully state there is no other option. And sadly, this will be true as they are stalling all upcoming projects to push through their masterplan to eventually provide recycled effluent water to everybody regardless of where you live. This must not be allowed, and SW must carry on with proposed projects such as prioritising leak repairs. Currently SW lose 19% of all treated water via leakage in their distribution system. They also lose a further 3.2% of the water before it even reaches their plant for processing. If this work was prioritised and completed, they could achieve a 50% | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting |

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| | reduction to these figures by 2040 and 70% by 2050 but instead they are only aiming for a 53% reduction in total across the board by 2050 which is unacceptable.<br>Another concern is the lack of acknowledgement of the Hampshire Grid improvement programme which will rezone the supply area. SW have not allowed for the new improved connectivity that would be available and by using data excluding this, will mean it could adversely impact on the Hampshire Grid decisions being made to the detriment of this intended scheme. SW must revisit their plan to allow the Hampshire Grid to go ahead as currently planned to improve connectivity and amend their proposed figures appropriately.<br><br>Looking at another element of this proposal, the effluent recycling plant and operation is a major concern. The environmental relief from water storage solutions will outweigh the intended cost of this work. In essence, to build reservoirs for Hamble, Wallington and Adur will cost less than the current proposal, which is around £1.2Bn. As one looks at their plan, it becomes clear that SW are presenting us with a short term, hugely expensive solution that is power hungry and will leave consumers with bills that will spread over many years to pay. Indeed, it looks like the cost of these works will not even be paid off by the time the works need replacing. 60 years life for the actual recycling plant which then will have to be rebuilt, but the worst is not clearly enounced by SW. The components will require daily use even when no drought is present. The system only works with constant use so millions of gallons of water will need to be sent up this proposed 40 Km (!!) pipeline to [redacted] every day and all the new Works will need to operate every day to maintain their capabilities. Why would this even seem reasonable when a suitable site for water storage could be found nearer Southampton to cover the area around there?<br>The intention to link into the Havant Thicket reservoir is frightening. This reservoir was never passed for an environmental buffer lake, it was passed by everyone on the understanding it would comprise spring water/rainwater only and be used in a drought if necessary. NO environmental group involved would have agreed to recycled effluent water being stored there. The possibilities for contamination are extremely high because SW have no idea how their new systems will work. The filters for reverse osmosis need daily maintenance and regular replacement every 5 years or so. Are SW going to be able to be relied on to carry out this, when in reality SW will try to push the lifespan of these filters to their limit, with all the implications of that. Should any contamination occur from SW systems, the reservoir cannot be cleaned, and this very expensive storage will be polluted for ever. This reservoir which should be able to supply water for many, many years must not be put at risk by someone who has no experience in this technology in any way.<br>This whole concept as a so-called drought solution is going to cost £3M yearly (at current figures) just to keep it working, come winter or summer. How can this be justified as a suitable drought solution?? In fact the running cost of this project is nearly as expensive as the tankering option per megalitre so that proves SW are not approaching this project with any environmental appreciation or interest. SW do not even have any history with this machinery as it has never been used in this country before. Their failure rate for repairing leaks is exorbitant so just imagine how many times this untested unknown solution will fail due to lack of maintenance and inexperience with the operators of this equipment. | the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies.<br>Our supply area is classed as being under ‘serious water stress’ by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. Multiple options were considered during the options appraisal process that was carried out as part of the |

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| | To add to this issue SW by their stalling actions, will then leave DEFRA/regulators with a solution of tankering water from Norway with the associated costs and the fact that this water would need treating which will involve a cost before it can be used, regardless of the shipping, transferring and storage costs. And suitable storage facilities will need to be found along with more pipework to transfer the water at extra cost. The only other solution will be to continue to use drought permits and the Candover Drought Option. This proposal relies on extending their use until 2034 and should be stopped due to environmental issues. SW are seemingly content to sit back and wait until the recycling scheme is delivered, which could be an extensive period as many objections are now being raised. SW must not be allowed to continually abuse these options until their plan is granted.<br><br>The construction of the new recycling plant on Broad Marsh on top of landfill has so many issues, it is unbelievable that they are continuing with this proposal. It is common knowledge that there is no lining over the harbour mud and due to the known contaminated waste that was used in this site, the possibilities for leachate into the water is very high. The amount of piling required, and the overall location of this plant is not acceptable in any way, along with the impact of the outflow, and SW should be directed to locate such a plant away from the coast. And then the 40 Km of pipeline needed to move the water to [redacted] adds to the query of why this site was selected. SW option assessment of this site has played down the risk factor to get acceptance of these works but the potential for damage is high. There are sites more suitable which could be used and SW must be pressured into making further investigation into one or more of these.<br><br>Again, I wish to register my objections to this SW plan until proper assessments, ecological concerns and better options have been included in a new version of SW project submission in order that correct decisions can be made regardless of time frames. | RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire in some scenarios. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and |

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| | | proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP853 | Dear sir or madam<br>I live in Littlehampton, and have a number of serious concerns about Southern Water's Draft Water Resources Management Plan. I am copying my local MP into this email, to ensure that she is also aware of these. Please see below for my response to the consultation:<br>I reject the proposals put forward by Southern Water for both desalination and the effluent recycling scheme, and urge them to look instead at more environmentally friendly and cheaper options. I don't feel that these have been considered seriously, and they deserve a proper, independent, public investigation.<br>Firstly, the desalination proposal was rightly rejected by public consultation in a previous incarnation of this plan. It's a high carbon, unsustainable, and expensive solution, and remains completely inappropriate. I find it insulting for Southern Water to attempt to bring this option back, when it has already been firmly dismissed.<br>I suspect this attempt was made due to the completely inadequate public consultation process for these new plans. As a Southern Water customer I do not feel that I was fully informed or consulted before the desalination and effluent recycling options were selected. There should be a full statutory consultation on all options, and proper attempts made at community engagement. In fact, I am only aware of these plans through the impressive efforts of local groups who are concerned about our environment.<br>Despite their upbeat e-newsletters, the reputation of Southern Water is already very poor. I still remember their record pollution fine of £90 million in 2021 and have seen friends in Barnham suffer from horrendous sewage overflow flooding. From their own data, Southern Water are losing 100 million litres of water (19%) every day due to leaks. Their plans for improvement included in this proposal completely fail to address this. They commit only to a target of 53% leakage reduction, so even by 2050 they will still be leaking around 10% of all our water. Any plans for their future should – as a minimum – address the issue of a proper mains replacement programme. As they have not done this, I do not trust them to build, operate and maintain what appears to be an additional, very complex treatment process with significant risks.<br>The lack of ambition on addressing leaks, plus the lack of information and proper consultation, only further damages my perception of Southern Water. If these plans go ahead the first that many local people will hear of it will be: a) the eyesore of new developments; b) stories of their tap water being 'recycled sewage' – turning more people towards plastic bottled water (as has happened in Singapore); c) ongoing spiralling costs and 'accidents' that cause higher bills plus priceless environmental impacts and personal tragedies.<br>The consultation rather patronisingly suggests that work on reducing leaks would cause disruption to local communities. But it's obvious that any measures to address our water security will cause some level of disruption – including the ones proposed by them. People understand this. What is also apparent is that new infrastructure would be more profitable for their shareholders than repairing leaks. This is precisely why we need a proper consultation on | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. The deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |

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| | all the options: their costs and benefits to all of us, and the environment, both in the short and long term.<br>In addition to addressing leaks, I would like to see Southern Water develop positive solutions for storing more rain water. We already get a lot of rain in autumn and winter, and this is forecast to increase with the changing climate. I was shocked to hear that only 1% of rainfall is collected in the UK. Across the country we should be looking at the role of reservoirs in mitigating our increased experiences of flood and drought, and Southern Water should address this in their planning as a matter of urgency. Instead they are proposing shipping water from Norway during droughts, which is a ridiculous and costly 'solution' when we could have local resources readily available. I would also like to point out that the phrasing of the consultation on this question in particular is very poor – it suggests that importing water is the only option to protect river water levels. This is clearly not the case, as there are numerous better options for collection and storage of rain water.<br>The Havant Thicket reservoir is mentioned in the proposals, but the completion date has been pushed back, and it is not clear how this will be managed. One further reservoir is suggested, but not until 2040. We experience regular seasonal flooding now, so this is a huge missed opportunity. Portsmouth Water previously suggested 80 possible sites for reservoirs – again, more and better consultation and research is needed for the public to reflect on these options. Instead these appear to have already largely been discounted as possibilities by Southern Water.<br>The limited discussion of Havant Thicket reservoir itself raises further concerns about protecting the ecology of the area. A careful development of local rain water reservoirs could provide a unique biodiversity opportunity. We are lucky to live in an area rich with chalk springs, and these combined with natural reservoirs could have a great environmental impact. We could have a positive biodiversity story for a change! In contrast, we know that the addition of recycled effluent into reservoirs results in damaging changes to their temperature, salinity and geochemistry, with knock-on effects on all the local ecosystems that rely on them. I am very concerned that Southern Water's plans will have a negative impact on these.<br>Alongside well-managed reservoirs, I would like to see a fuller consideration of the options for aquifer storage, which also appears to have been largely demoted in Southern Water's latest plans. Unlike effluent recycling, this is a proven, established, cheap, and simple technology. It also has a much lower carbon and environmental impact. Again, I would like to see our water systems being organised in a way that is both cheaper and more environmentally positive – these are not mutually exclusive choices.<br>In relation to costs, the estimated price of the effluent recycling project is already a minimum of £1.2 billion, and likely to be higher as it is unproven technology. Even at the conservative amount, the plans do not reflect good value for money. It's possible to build 3 new winter storage reservoirs for the same cost. These would provide recreational and biodiversity benefits for 200 years, whereas the more expensive and environmentally damaging effluent recycling plant is expected to be redundant in just 60 years. Documents from Southern Water also show that this scheme will have higher average carbon emissions and embedded carbon impact than that option of shipping in water from Norway! We desperately need sensible plans for our water infrastructure that take a serious, long-term view of our needs. A private company's 50 year plan is clearly not enough. | Regarding the need for a new consultation, we consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as |

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| | These costs also need to be considered in the urgent context of the cost-of-living crisis that we're living through. Water is not an optional extra, and us residents have no choice but to use Southern Water. A report from nearby Lewes District council identified that to fund these plans Southern Water would need to raise customer bills by 91% over the next five years. We can't afford it. As OFWAT are expected to cap any attempt to charge us this at 45%, the gap here places a huge question mark over the financial viability of the proposals. The investment in repairing leaks, reservoirs, and aquifer storage all appear to be much better value for money, and more realistic economics.<br>Although the effluent recycling plants are described as a 'drought resource' they will have to operate year-round to make sure the pumps and pipes remain in good working order. So on top of the expensive building, ongoing chemical treatment and operating costs will also be huge. In a climate emergency and a cost-of-living crisis, we should be looking for options that reduce energy use and costs as much as possible, rather than increase them. Southern Water have continually failed to provide the promised details on these energy needs, but it seems obvious that this is a high-cost proposal.<br>One of the proposed locations for an effluent recycling plant is an unlined landfill site, which contains large amounts of domestic and industrial waste. There is a clear danger that this waste will leach into the surrounding environment. In addition, several of the areas are also sites for internationally important migrating birds - which should not be disturbed. Clearly both the construction and operation of these plants will result in more light and noise pollution, blighting the environment for humans and non-humans alike.<br>With reference to my own home town, I am deeply concerned that there will be serious issues around reject water being discharged into the sea at Littlehampton. This water is predicted to be four times more concentrated than existing sewage discharge, which Southern Water have confirmed will negatively impact the environment. The residual chemicals and contaminants will be put into our sea, and the higher temperature means they will float on the surface. Despite these concerns on waste, there do not even appear to be adequate monitoring and management plans to maintain the plants and avoid pollution. We already suffer the consequences of regular 'sewage alerts' in Littlehampton thanks to Southern Water - and the impact on residents and visitors is immense. It's heart-breaking and infuriating to see them proposing more projects that work against the environment rather than with it. We simply cannot afford to allow Southern Water to push on with projects that will degrade our biodiversity and local ecology even further.<br>Thank you for taking the time to read my comments. I remain hopeful that public consultation responses can make some difference, and would like to request a response to all of the concerns I have raised.<br>Kind regards | options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Sea tankering from Norway is no longer included in our plan. |
| WRMP854 | I am writing to you today to express my concerns around the Water Resources Management Plan Consultation of Southern Water.<br>I believe that Southern Water should be focusing more on creating sustainable solutions. I think it's important to use this opportunity of developing the Havant Thicket Reservoir and other recycling schemes to balance collection and storing to reduce flood risks in and around the local communities they are based in.<br>I also believe that there needs to be more ambition regarding leakage reduction. At the moment | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. |

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| | around 3% of the water Southern Water takes from the environment is lost before it reaches the treatment works, a further 19% of water that is paid for by the consumers is lost in the distribution network. This results in figures exceeding 100 million litres of water being lost every day. It is my opinion that Southern Water needs to deliver faster water main renewing programmes and replace the aging pipeline to get this issue under control.<br>I personally have concerns around Southern Water's trustworthiness in our local community. In recent years they have had several failures in sewage treatments and have been fined over 238 million pounds for:<br>manipulating information (£20.3 million), discharging raw sewage into the sea (£160,000), a raw sewage spill (£200k), discharging raw sewage from a wastewater and treatment plant (£2 million), failures at treatment sites (£126 million), deliberately pouring sewage in the sea (£90 million). The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable.<br>I also feel that Southern Water needs to do more to protect the environment and develop a strategy that helps them honour their commitment to be carbon neutral by 2030. River catchments could be protected quickly if river catchments were moved closer to the tidal limit and abstraction boreholes down the catchment. This would in turn reduce the priority for abstraction reform (which is driving the need for effluent recycling). Options that don't have a carbon and emissions footprint need to be developed.<br>It should be noted that the effluent recycling schemes for Hampshire and Littlehampton have the<br>highest negative environmental impact score of any other considered options. Furthermore, the effluent recycling schemes that are to be developed by 2035 each have a higher carbon impact than that of the water from Norway by sea tankers.<br>Finally, if the plan based in Havant is to go ahead I think an alternative site for the recycling plant should be found. There is a risk of constructing large tunnel shafts and piles through the 13m of deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br>I would appreciate your acknowledgment of these concerns. These are very close to my heart as a resident of the Havant Borough.<br>I hope to hear from you soon. | Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst |

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| | | having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. Sea tankering from Norway is no longer included in our plan.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP855 | Please see the response below from Havant Friends of the Earth.<br><br>1. Summary<br>We object to Southern Water's Plan to develop effluent recycling as an alternative water source. We do not think it is an appropriate drought solution. There are other more sustainable options that could protect chalk streams such as the Itchen, Test, Meon and the Ems.<br><br>2. Responding to Climate Change<br>Southern Water's Plan emphasises the need to adapt to the possibility of severe droughts, while not taking sufficient account of severe heavy rain events, also predicted by scientists. The Plan | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) We note the objection to Hampshire Water Transfer Water Recycling Project (HWTWRP).<br><br>2) see 5e |

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| | should focus on maximising opportunities to capture and store this free resource, for use during droughts, which will also reduce flooding risks.<br><br>3. Level of need<br>We think that Southern Water have over-estimated future demand deficit, which is to their advantage as it helps to make their case for effluent recycling.<br><br>3a) Population<br>Justification of need for effluent recycling is based on Southern Water's estimate of population growth between 7% and 34% from 2025 – 2075, indicating a baseline growth for their revised plan is 23%. Why are they not using the ONS figure of 16%, approved by OFWAT? Southern Water's population growth forecast figures are inconsistent and vary between different elements of their Plan. We think that Southern Water are choosing an over high projection of population growth and the figures need careful analysis by DEFRA and their advisers<br><br>3b) Smart Meters and Water Butts<br>We do not yet know how the roll out of smart meters and smart pricing might further reduce demand. A more widespread distribution of free water butts might also make a difference.<br><br>3c) Hampshire Grid improvements<br>SW have not taken into account the Hampshire Grid improvement programme, available to rezone the western supply area from 2030. The Company option review and selection process is based on individual supply zones. Taking account of the increased ability to transfer water within Hampshire by merging existing zones could have changed the options appraisal process.<br><br>3d) Hosepipe bans<br>Measures to improve water provision should not be to a level where all hosepipe bans are avoided. Occasional hosepipe bans serve to educate people about the value of water, the need to reduce consumption and avoid wastage.<br><br>4. Effluent Recycling<br>Although we have focussed our response on the Hampshire Recycling Scheme, we are also concerned about the selection of 3 other effluent recycling projects in the Plan. The selection of all 4 schemes appears premature when many of the risks are unknown, studies are not complete, and other more sustainable options have not been properly assessed.<br><br>4a) Costs<br>We remain opposed to the Hampshire Water Transfer and Water Recycling Project because of its high financial, energy/carbon, chemical and environmental cost.<br><br>4b) Financial costs<br>Construction of the Havant water recycling plant and 40 km transfer pipeline to [redacted] will cost £1.2 billion to build (and rising) plus £395 million per year to operate, including energy, chemicals, staffing and maintenance costs. Of the options known to have been appraised by | 3a) We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 34% to 7% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>3b) All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030.<br><br>3c) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>3d) We will continue to rely on Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs) as means to reduce demand during droughts.<br><br>4. We have noted this comment.<br><br>4a) We have noted this comment.<br><br>4b) We have noted this comment. |

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| | Southern Water this is one of the highest cost solutions. It is estimated that it will only last about 60 years and will leave no legacy. This does not present best value for customers. For the cost of this scheme you could build 3 reservoirs to store winter rainfall, which could last for 200 years and have low operational costs.<br><br>4c) Energy and Carbon costs<br>The recycling project is contrary to Southern Water's commitment to achieve net zero carbon by 2030. The operation of the reverse osmosis plant and pumping water 40 km from Havant Thicket Reservoir to [redacted] will result in excessive carbon costs and greenhouse gas emissions from 2030. These will be among the highest emissions for any of the options possible, even worse than those resulting from tankering water from Norway. This could present a significant risk at a time of global energy insecurity.<br><br>Southern Water say that they expect to mitigate this by capturing renewable energy for the project, by burning methane from sludge at [redacted]. However at the present time, [redacted] are only able to produce 70% of their own electricity needs from this. Southern Water also talk of generating electricity from solar panels, but it is doubtful that this can provide more than a small part of the daily electricity needs. It will still need to draw a large amount of electricity from the grid, at a time when there will be many competing demands on that, from increases in domestic electric heating and electric vehicle charging. Although the grid is decarbonising, it will be some time before high electricity use can be seen as being without an associated carbon cost.<br><br>Southern Water should develop a strategy that prioritises low energy solutions that are sustainable and work with climate change.<br><br>4d) Technology<br>The nature of the reverse osmosis process means that it is not fit for purpose as a drought resource as the process must be run continuously. In Havant's case this will produce 30 Mld of water, 365 days per year, as its minimum flow, to avoid damage to the membranes, pipes and pumps. It cannot be switched off when not needed. This is not a sensible nor sustainable solution.<br><br>4e) Risks and environmental impact<br>Southern Water say that they take environmental impact into account when choosing options. If so, why have they not rejected this scheme which has the highest negative environmental impact of all possible options? It risks impacts on Langstone Harbour, the Solent, Havant Thicket Reservoir and the countryside along the 40 km pipeline route.<br><br>4e)(i) Risks from contaminants<br>The Reverse Osmosis treatment process is very complex, requiring very close management and monitoring by highly trained & competent operators, a fairly consistent treatment stream, and a lot of maintenance which is expensive. It should be technically possible for a well run plant to remove most but not all contaminants. However Southern Water has a poor track | 4c) Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br>The requirement of the Hampshire Water Transfer Water Recycling Project (HWTWRP) is to protect the Test and Itchen, by the reduction of the abstraction on the rivers. In addition, Southern Water have a leakage and demand reduction programmes, which reduces the usage and maximum capacity of HWTWRP. The consequence of this is that a significant percentage of the water demand will still need to be transfer into the area. While the option being progressed uses the lowest power demand, there is still a significant demand placed on the national grid. Southern Water are looking at alternatives power supplies, but they need to be robust and deliverable to support the operation life of this National Significant Infrastructure Project.<br><br>4d) Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>4e) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. |

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| | record with coastal discharges, poor maintenance, telemetry failures, and £92 million in recent fines. We do not trust this company to run this technology safely. People are particularly concerned about the recycled effluent being pumped to Havant Thicket Reservoir, which Southern Water will use as an 'environmental buffer lake'.<br><br>Thousands of people in the Portsmouth Water area, will be drinking the mixed spring and recycled water during an emergency or a drought. From 2040 they will receive it more routinely and this will then include parts of West Sussex. All could be placed at risk if any chemical or organic contaminants got through the recycling process and into the reservoir. The results from the trial recycling plant in 2023 raise significant concerns, with bacteria in output water and low sampling rates for pesticides, pharmaceuticals and trace organics. That Southern Water will also be in sole charge of testing water quality from the recycling plant before it enters the reservoir, does not re-assure us, especially with their track record of delays responding to alarms, and manipulating data.<br><br>4e)(ii) Environmental risks to the Reservoir<br>The project is being promoted to the public now, although full results of Environmental Impact Assessments are not yet known. We do not know what will be the effects on the chemical balance of the reservoir and how that could effect biodiversity. There will be changes to temperature, salinity and geochemistry which could all impact the ecology.<br><br>4e)(iii) Environmental risks to the Solent<br>The preliminary environmental assessment raised concern about the likely significant effect on the Solent of the reject water from the treatment process, being discharged into the sea. It will be 4 or 5 times more concentrated than the usual treated effluent release. There is particular concern about the concentration of pesticides, pharmaceuticals, forever chemicals and chemical disinfection by products.<br><br>4e)(iv) Reducing nitrates in Langstone Harbour<br>A benefit of the spring fed reservoir was that it would reduce the amount of spring water entering Langstone Harbour, reducing nitrate levels from legacy agriculture, which harm the Harbour ecosystem. If the reservoir is to be regularly topped up with recycled effluent, more of the spring water will have to be released into the Harbour, increasing nitrates.<br><br>4e)(v) Risks to Langstone Harbour due to siting the recycling plant on contaminated landfill.<br>We are particularly concerned about the plan to locate the recycling plant on a contaminated landfill site at Broadmarsh, Havant. This is known to contain solvents, hydrocarbons and asbestos among other toxic materials. The site is close to Farlington Marshes and Langstone Harbour, a Ramsar wetland of international importance with SSSI and SAC conservation status. There are significant risks to this habitat, because the plant will require deep piling and tunnelling through the landfill to the chalk aquifer below, likely to release toxic leachate into the Harbour. There are safer and more suitable sites for the plant which avoid this unacceptable environmental risk. | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

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| | 4f) [redacted]<br>If recycling effluent must be progressed, [redacted] Waste Water Treatment Works, near Fareham, would be a better location. This was considered by Southern Water but shelved. It would have the advantage of having space for the effluent recycling plant away from the coast, reducing environmental risks. Although it would require an environmental buffer lake to be built, it would also be a more sustainable solution as the plant would be closer to where the water is actually needed in Southampton and Winchester. This plant would not have as much effluent to process as [redacted], but in combination with more sustainable alternative water sources, this may be sufficient.<br><br>5. Alternative water sources<br><br>5a). Tankering water from Norway<br>This has been selected by Southern Water as a temporary drought solution if needed before recycled effluent comes on line, which is planned for 2035, but there are high risks with the new technology that this will be delayed further. We oppose this as it would come at excessive cost and high environmental risk. Norwegian water is chemically very different from water in the Test and introduces new risks from acidity and non-native organisms. Southern Water have mentioned an alternative – working with industries in Southampton to reduce their use of potable water. We think that much more priority should have been given to this in the early part of the Plan, as well as working with commercial users, golf courses, high use agriculture and community buildings to reduce their water use.<br><br>5b) We believe that there are many more sustainable and environmentally friendly alternatives to effluent recycling, which if used in combination and progressed now, could meet water needs without the necessity of using recycled effluent. Southern Water have not completed a full review of these alternatives "a full re-appraisal exercise was not considered time or cost beneficial" (Annex 20, page 3). Given the pressing need to find solutions for the Rivers Itchen and Test they have now wasted more time. A full review of all the options should be a matter of urgency. As the Recycling Project may not be operational until 2035 or beyond, some of the alternatives, could be available within 3 to 6 years if progressed urgently now. A strategy to protect our rivers should not wait until 2035 in the hope that Southern Water can get approval for effluent recycling. Their strategy of putting all their eggs in one basket, failed with desalination, and they should not be repeating the same mistake with effluent recycling. At a minimum they should be taking a twin track approach, developing more sustainable alternatives alongside their recycling project.<br><br>5c) Abstraction from above the last weir/tidal limit.<br>Abstraction here, rather than further up the river catchment, would preserve the freshwater environment along the length of rivers such as the Itchen and Test, not just in a drought. The only requirement would be for additional pipework to take the water to the water treatment works. If action on this was started immediately the water could perhaps be available in 3 years time. The amount of fresh water entering the estuaries would be no less than it was previously, assuming that abstraction levels are not permitted to be greater than current levels. This | 4f) Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>5a) Regarding the chemical composition of water brought in by tanker, this option is no longer included in our plan.<br><br>5b) Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of |

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| | method could also be applied to protect other rivers in Southern Water's area. This is supported by a former managing director of Southern Water who has written to DEFRA to promote this option, which is covered by the European Water Framework Directive. The UK Technical Advisory Group report indicated that estuary water can be abstracted 365 days per year to 50% of the 95% percentile flow rate. From records for rivers in the South East this would allow abstraction of 1,750 million litres per day. This is a much more sustainable and cheaper solution, protecting our rivers and drastically reducing the need for abstraction reform which is driving Southern Water to select effluent recycling.<br><br>5d) Extracting water from rivers when water levels are higher, often in winter.<br>It does not make sense to stop all abstractions from chalk streams. It should still be allowed when levels are high. It would not endanger the water environment and would also reduce flooding risk. What is needed is a more flexible approach to abstraction from rivers, based on environmental risks, including flood risks. This could also be applied to other rivers. Such abstraction would need to be combined with water storage options – nearer to the point of use to avoid the high costs of pumping water long distances.<br><br>5e) More Reservoirs<br>Research shows that customers prefer more natural water resource solutions, like new reservoirs and water storage in aquifers. But Southern Water are ignoring this with no plans in place for any new reservoirs in Hampshire. The River Adur offline reservoir in West Sussex is not scheduled for delivery until 2045. Why not prioritise this sooner?<br><br>Given the crisis in water supply that Southern Water have emphasised, why are they not looking for other sites for reservoirs, closer to where the water is needed. There should be an active programme to find sites where they can store the additional water that will result from climate change, and which can meet the deficit in times of drought.<br><br>5f) Aquifer storage<br>Water storage using the Test Managed Aquifer Scheme, has been recognised in this plan but is being held back. Many other potential aquifer storage sites have been identified by Southern Water but have been "parked". Their excuse is that yield is uncertain and further investigation is needed, so schemes have been deferred until WRMP 2029. This is not acceptable. Test MARS and other aquifer storage options should be investigated and developed as soon as possible. The amount of water that any one can hold may not be great, but in combination these schemes could retain and deliver a significant amount of water during a drought. Ensuring that aquifers are topped up during periods of heavy rain, where they are sufficiently confined, could provide a minimum cost sustainable solution which would work with climate change. Even if the yield is small these schemes must not be delayed.<br><br>5g) Southern Water have included a few of these schemes in the current Plan, but they are being delayed while many other options have been "parked" and not included at all. Instead they are presenting effluent recycling as the only solution, both to DEFRA, the Environment Agency and the public. This makes the public consultation completely inadequate. | our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>5c) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>5d) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences. The licences typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods. The availability of excess water does not mean that we can exceed the volumes permitted in our abstraction licences. The treatment capacity of our sources typically corresponds to the licence or the demand in the area supplied by the source.<br><br>5e) Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>5f) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | 5h) Southern Water say that the Environment Agency will not allow them to progress these other schemes. Under their optimisation process Southern water say they must first wait to see the results of smart metering. However this is not preventing them from pushing ahead with effluent recycling and there is scope for a twin-track approach. The Environment Agency indicate they can only respond to projects that the water companies have selected and put forward to them in sufficient detail. Southern Water have not done this with the more sustainable options.<br><br>5i) Investigation into greener lower cost schemes and their development should be started as soon as possible. Only when these schemes have been investigated and come into operation, and their water yield known, should there be consideration of whether very expensive effluent recycling projects are needed as an additional resource. This will also allow time for longer term demand to be forecast with more confidence, as we will have more certainty on abstraction reform needed and population growth. A delay might also allow time for technology to progress, perhaps enabling a water recycling system which can be switched on and off when needed.<br><br>5j) Changing the water industry funding mechanism is essential to stop incentivising infrastructure heavy solutions which have to be paid for by customers. On top of which they must pay to service the huge debt that will be associated with Southern Water's Plan. Instead the funding mechanism should incentivise the development of cheaper sustainable solutions that work with climate change. It also needs to drive greater investment in mains repair and replacement, to speed up the reduction of leaks.<br><br>5k) Fixing leaks.<br>Southern Water lose nearly 100 million litres per day of treated water through leaks, 19% of the water that customers have paid to treat. They only propose to reduce this by 53% by 2050, i.e. still losing around 10% of all the water they treat, including, from 2030, highly expensive recycled water. This is not acceptable and is related to Southern Water's very poor record of replacing ageing water mains. They should not be planning high tech infrastructure to sit on top of a crumbling water network which wastes so much precious water taken from the environment. | 5g) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>5h) Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>5i, j) We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to |

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| | An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050. This would greatly reduce the need for alternative water sources.<br><br>6. Lack of consultation<br>When Southern Water made a material change to their plan, from desalination to effluent recycling, they did not carry out a full review of all of the alternative options, nor did they undertake a statutory consultation. This is not acceptable. The proposal for effluent recycling will impact everyone in South Hampshire, the Isle of Wight and West Sussex.<br><br>There has been insufficient advertising of this consultation. All customers should be consulted before such a major change to their water supply takes place. Notice could have been sent to everyone via their water bills, but Southern Water rejected doing that.<br><br>7. Plastic bottle mountain<br>Where recycled effluent has been introduced in other countries, it has not necessarily been used for drinking water but mainly for industry and agriculture. Where it has been used for drinking water there has been an increase in people drinking bottled water, resulting in a plastics mountain. The financial and social impacts of water rejection along with the environmental impact has not been considered. Southern Water, DEFRA and the regulators must take account of this.<br><br>8. Conclusion<br>We object to Southern Water's Plan to focus on effluent recycling as the solution to meet water deficits in our region. Level of need has been overestimated. The Havant plant and pipeline will be highly costly to construct and operate. It will come with high negative environmental impacts. The technology will not be fit for purpose as a drought resource because of the need to keep it running continually 365 days per year. It will not be best value for customers and consultation about it has been inadequate.<br><br>We have described various cheaper, environmentally friendly and more sustainable options that put people and the environment before profit. These options<br>could, in combination, work with climate change to store free water at times of heavy rainfall. This could then be available to meet needs in times of drought.<br><br>We have also included details of moving abstractions down river to just above the tidal limit, which could protect the water environment along the length of chalk streams.<br><br>Southern Water are on the wrong path. They should be urgently investigating and developing these more sustainable schemes. Only if water supply proves inadequate, once these schemes are in operation, should effluent recycling be considered at a later date. We urge DEFRA to reject this Plan, challenge the assumptions and require Southern Water to actively investigate and prioritise bringing forward more sustainable options. | meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>5k) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>6) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/ |

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| | Submitted on behalf of Havant Friends of the Earth | 7 & 8) Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP856 | SW ' Water Resources Management Plan' – November 2024<br><br>Dear Secretary of State Reed,<br><br>I am deeply concerned about the proposal to recycle effluent water and feed it into the Havant Thicket Reservoir. Havant Council originally gave planning permission in 2021 on the basis/understanding that the sole input of water would be water diverted from Havant and Bedhampton's renowned springs.<br>Even though Havant Borough council, local communities, individuals and Hampshire County Council have voiced objections to Southern Water's plans to recycle Effluent water and turn it into water that is supposedly drinkable, something that has never been done in this country before, it seems that no one in the appropriate authorities are listening to us.<br><br>Why, if Southern Water want to recycle effluent water, cant they build their own reservoir to store it?<br>What's the advantage of mixing the recycled effluent water into a spring fed reservoir?<br><br>If we need to collect more water, is it not possible to more cost-effectively collect rain water? Apparently we only collect 1% of rainfall in the UK.<br>Rainfall is a freely given gift of nature, surely Southern could build a reservoir to catch rainfall and engage local communities to collect rainfall from roofs. This could provide many benefits to communities from recreational sites to biodiversity opportunities.<br><br>19% of the water that Southern customers have paid to treat is lost in leakage in the system. Southern Water must to be mandated to deliver a much faster programme of renewing water mains to replace their ageing pipe network, or they will never get leakage under control.<br><br>Southern Water also have an appalling track record of prosecutions for pollution incidents, and often they fail to take adequate and immediate action. to rectify issues. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Regarding storage, we are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | I live in the Lavant Valley where they have been 'overpumping' effluent water that is supposedly very dilute into the River Lavant. Our River has been declared 'dead' after over 14 years of this practice, meaning we don't see the wildlife and biodiversity that was once a beautiful rare chalk stream (I think there's only 15 of them in the country):<br>https://inews.co.uk/news/chichester-river-pumped-non-stop-waste-2977264<br>informs us that the Chichester River Lavant was pumped with 273 days of non stop waste in 2023.<br>"Untreated sewage was discarded into the River Lavant in West Sussex for 6,542 hours last year"<br>"In total, Southern Water's Lavant Wastewater Treatment plant overflowed for 6,542 hours, the equivalent of 273 days of non-stop sewage.<br><br>Chichester harbour, a designated area of outstanding natural beauty once known for its oysters, is among the areas impacted by the sewage overflows.<br><br>(In February, i revealed how the nine-mile Lavant, which runs from the village of East Dean to Chichester, was "effectively dead", due to Southern Water pumping untreated water into the river.)<br><br>Furthermore, Southern Waters Water Resources MGT Plan has a high carbon footprint.<br>HavantMatters.org inform us that<br>– The Hampshire and Littlehampton effluent recycling schemes have the highest negative environmental impact score of any of the options considered.<br><br>– The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by sea tankers.<br><br>Worse, on digging deeper as this plan made no financial sense to me when I first looked into it as it is resource intensive and expensive to set up, it seems that the DEFRA water industry funding mechanism incentivizes infrastructure heavy solutions,<br>Can Defra not encourage development of sustainable solutions that work with climate change?<br><br>Finally, on behalf of our community, I second SOSCA's requests for:<br>1. An in depth independent review of the entire proposed infrastructure by independent qualified professionals in this field be published.<br>2. An in depth independent review of the ability for SW's recycling engineering to satisfactorily cleanse the recycled effluent removing all known chemical pollutants and pharmaceutical contaminants by independent specialists in this field.<br>3. An in depth independent review of the costings of all the proposed infrastructure, pipes, pumping stations, etc. by independent financial advisers.<br>4. And a costings of the on going maintenance required for a project that will be required to run daily all year round and not just in drought conditions and to forecast the life time of such a project. | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/.<br><br>In 2025 our team will be implementing a £3.3m project to seal sewers and manhole covers in Charlton and Singleton, in the Lavant Valley, to keep groundwater out of our wastewater pipes during rainy periods. This follows the completion of a £1.1m project to seal sewers in the neighbouring village of East Dean in 2024, and is similar to work continuing in nearby Funtington and Bosham. This area has, historically, suffered badly with a build-up of groundwater during the wetter months of the year, and when this seeps into our network it can overload the system. This can cause flash flooding locally, and also trigger storm overflows further down the valley and into Chichester Harbour when the influx of water is too much for our treatment sites and pumping stations to handle – requiring releases into the environment to prevent more homes and communities from flooding. Once work is complete in Singleton and Charlton, we will continue to work our way down the Lavant Valley.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Sea tankering from Norway is no longer included in our plan. |

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| | 5. An independent review of the state of the infill-site at Broadmarsh which will be cut open to enable all the 45kms of piping required to transfer the water to the [redacted] pumping station and beyond.<br>6. And for the forecasting of the chemical and health impacts the opening of this infill site will have on the harbour and communities.<br>Otherwise I fear for the future integrity of our drinking water, | |
| WRMP857 | I am responding to Southern Water (SW) latest consultation "Our consultation on securing a resilient water future for the South East". Closing date - 3rd December 2024.<br>_____<br><br>There are so many different elements within this consultation: my response focuses on just two.<br><br>[A] That SW give more attention to smaller scale / sustainable options than the high cost and high impact solutions proposed.<br><br>I believe that greener and lower impact solutions to the issue of water shortage in the south east do exist. Amongst these are to give the water companies more challenging targets for leakages and mains renewal.<br><br>If the plan took more notice of predicated changes to our climate, then more winter rain could be captured and used in dry summers. This is a good quality free water resource. SW should be designing and carrying out more schemes to capture it in winter and store for dry summers.<br>It has been commented on that the population growth estimates given in the Plan are too high. An over estimate could be used to push for major projects like the Hampshire Water Transfer and Water Recycling Project (HWTWRP).<br>The investment model needs to be able to preferentially select smaller more sustainable options, whereas it currently favours large ones like the HWTWRP.<br>More challenging targets should be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control.<br>The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. As this is essential, it should be prioritised and funded soon so that these schemes can be included as feasible options.<br>To develop multiple smaller schemes, close to where the water is needed, seems more resilient and more sustainable than large and expensive projects, which are likely to have a greater effect on the environment both initially and in the longer term.<br>Would it not be better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>The public favour more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the |

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| | If there was a situation like a sustained loss of power or a major fire at the Water Recycling Plant (WRP), would the planned infrastructure enable customers to receive a water supply that excluded the contribution from the WRP until the emergency was over?<br><br>I understand that SW have not completed a full review of the Plan considering all alternative options as "a full re-appraisal exercise was not considered time or cost beneficial".<br><br>[B] That the proposed Hampshire Water Transfer and Water Recycling Project (HWTWRP) does not go ahead.<br><br>Large infrastructure schemes should be a last resort once more sustainable options have been exhausted. This project should not be put forward as an initial solution.<br>There have been questions raised over the Plan's estimates of population growth in the area due to be served by the HWTWRP. If it is an over calculation, then this proposed large scale project is probably not the best solution.<br><br>I understand that SW is allowed to make a profit from building new infrastructure. The proposed project is going to be a high cost and high impact solution and the question is how essential is it to have something on this scale?<br><br>The costs are going to be felt by SW's customers over an extended period of time. One example of costs is the need to keep the proposed plant and pipelines running 365 days of the year, although the treated waste water is not needed all the time.<br><br>The selection of effluent recycling via Havant Thicket and the transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions<br>Also, I have concerns about the resilience and long term value of privately owned water companies working independently of each other, devising major stand alone schemes like the HWTWRP.<br><br>The proposed location of the Water Recycling Plant on the contaminated landfill site at Broadmarsh wastewater treatment works at [redacted] is also a concern. Apart from the potential environmental hazards and the visibility impacts, the construction and then ongoing processes at the plant are likely to have a negative on wildlife and plants.<br><br>---<br><br>I have been underwhelmed by Southern Water's amount of, and methods for, publicity on this latest consultation. I belong to some environmental groups and also, via the BBC web pages, follow daily the local news for Dorset, Hampshire and the Isle of Wight. Consequently, I should be well placed to notice Southern Water publicising it: I only learnt of it quite recently. | environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>Aquifer Storage and Recovery (ASR) schemes can have significant additional technical challenges and cost implications in comparison to MAR schemes. ASR within the Lower Greensand Group has additional challenges including shorter operational asset life, aquifer mineralogy (metals) and abstracted water quality challenges, greater downstream treatment needs, and more stringent daily operational management and control around water cycling (and so also less flexible).<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not |

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| | | possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP858 | Dear DEFRA<br><br>As a local resident and Southern Water bill payer, I am writing to express my extreme dissatisfaction with the Southern Water Resources Management Plan.<br><br>I have 6 main concerns with the current proposals:<br><br>1. The Funding of the Hampshire effluent recycling scheme – backdoor enrichment of Southern Water shareholders<br>The cost is enormous and will be debt funded. The funding of this debt is simply another route for the enrichment of Southern Water shareholders. I believe either the debt should be funded elsewhere or the profits on the debt included in the profits shown by Southern Water as part of the scheme (which are already excessive).<br>2. Alternative lower cost solutions have not been adequately considered or made available to the public<br>This is another example of the UK water industry being incented via Ofwat to pour concrete in large scale schemes (in the name of asset investment) rather than looking for lighter weight simpler solutions not requiring huge capital investment. Consideration of the alternatives has not been made public and the key documents are not available for public scrutiny. Examples include new boreholes close the where the water is needed, and river abstraction close the sea. We receive abundant rain during winter, and Southern Water should explore solutions to store this natural water for use during dry summers.<br>3. Environmental pollution: Impact of Effluent Recycling Scheme on the Solent<br>There are substantial environmental concerns related to the effluent recycling scheme, particularly regarding the discharge of concentrated reject water into Langstone Harbour and the wider Solent. Furthermore, during the construction phase deep tunnel shafts are proposed at Broadmarsh, adjacent to [redacted] and on the banks of Langstone Harbour. This is a historic landfill area containing unknown, undocumented toxins and pose a significant risk to Langstone Harbour's ecosystem.<br>4. The solutions are excessively energy Intensive<br>The reverse osmosis solution proposed for the [redacted] site is a very, very energy intensive solution never before used at scale in the UK. This technology is generally only deployed in much hotter climates where there is large amounts of renewable energy (e.g. large scale solar energy). Furthermore, the site of the [redacted] plant is 40km from where the water is required – again pumping water over very large distances is also very energy intensive. The Hampshire scheme is a high carbon solution and will cost more than £3 million/year to run.<br>5. Lack of focus on leakage<br>Southern Water need to have a much more ambitious programme of action to reduce leakage, 3% of water Southern Water take from the environment is lost before it even reaches the treatment works, then a further 19% of water that customers have paid to treat is currently lost | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |

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| | to leakage in the distribution network. They have been one of the slowest to invest in advanced pressure management solutions to control leakage and extend the life of the distribution network.<br>6. The public were deceived about the use of the use of Havant Thicket reservoir<br>The Havant Thicket reservoir was sold to the public by Portsmouth Water as containing water from chalk aquafers. Mixing this with output from the Effluent Recycling Scheme will mean that Portsmouth Water customers will no longer get the water quality they have been used to but will receive a different product without having had the opportunity to specifically object.<br><br>In conclusion I urge you to reject the current Southern Water plan and require Southern Water to develop a more sustainable plan that works with climate change & which puts the environment before profit. | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/ |
| WRMP859 | I am strongly against Effluent recycling-<br>For me one of the main issues is TRUST.<br>Do I TRUST SW to recycle sewage and put it in my drinking water?<br>'No' is the answer and it's a resounding 'no' from practically everyone I speak to. They are not doing the job they are paid to do now properly- why should we TRUST them to do this?<br>There has been pollution incident after pollution incident which has lead to a breakdown of trust in both Southern Water and Portsmouth Water. Treatment plants and pumping station have regularly failed, there have been prosecutions and huge fines for pollution incidents and they have failed to take prompt action to rectify problems. Reverse osmosis is a complex advanced treatment process - how on earth can we be asked to trust SW to do this properly and supply our drinking water?<br><br>And if people don't TRUST the water coming out of their taps they will turn to bottled water - Singapore being a case in point. Thus creating a major problem with plastic bottles and all the environmental implications.<br><br>Do I TRUST them to contain the leachate<br>from the landfill when they pile into their chosen site at Broadmarsh? Again no! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and |

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| | When a contaminated land expert tells us that it will be virtually impossible to control the contaminates which will leak out into langstone harbour - they should listen. Enough damage has been done to the harbour with their sewage discharges! This is just not a sensible site for all this piling to build the plant along with tanks and pipelines.<br>How can this ever pass the environmental assessment?<br><br>I don't TRUST their calculations that this is the best value option for the customers.<br>The costs of building the infrastructure needed for this project- the plant, shafts , pumping stations and the kms of pipelines has already spiralled to £1.2 billion! We all know who will be paying for this!<br>The cost of actually running this will be astronomical - some have calculated £5million per year.<br>How does all the energy needed to run this scheme fit in to this pledge to be net zero by 2050?<br>SW:<br>'We understand the important role we, and the water sector must play in reducing emissions ….<br>We remain committed to achieving net zero by 2050'<br><br>I cannot see how this pledge is compatible with the huge energy demands of effluent recycling.<br><br>If they were really committed to the environment you would be ramping up looking for environmentally sustainable solutions- but instead these have been shelved. When anyone asks about any other solution they say it's been looked into but it's been dismissed. They then quote documents and appendixes without page numbers that are virtually impossible to find.<br>Indeed those who have spent hours trawling through them have found cursory mentions and inadequate investigations into aquifer recharging and pushing back abstractions to the tidal limit to leave the water in the river as long as possible and virtually no mention of future smaller reservoirs.<br>These are real alternatives to this environmentally unsustainable project.<br>SW need to be forced to look into them seriously.<br><br>They are trying to make the public think that this is the only option because they are determined to push ahead with this scheme - and this is just not the case.<br><br>The recent months of rainfall and the fact that the amount of rainfall we receive each year has not declined- (just a changed seasonal distribution) leads everyone to the blindingly obvious fact that we have enough rainfall we just need to capture it rather than let it cause major flooding and then flow out to sea!<br>Forecasters tell us there will be wetter warmer autumns and winters ahead.<br>It is shocking that with all the rain we have in this country we only capture 1% of it.<br><br>I put it to you that it is utter madness to be making potable water from sewage at great expense when we are letting fresh, free water go to waste.<br><br>For the £1.2 billion that is the current estimated cost of this scheme to build ( let alone the £5million per year to run it) you could build 3 reservoirs which would have low running costs and | proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding storing rainfall, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Regarding the suggestion that three reservoirs could be built for the cost of Broadmarsh ERP, no detail is provided on proposed locations, capacities and volumes that could be reliably obtained. Therefore, we are unable to comment on the relative merits of HWTWRP compared to these schemes.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | would last up to 200 years. In a stroke you would solve many problems of flooding, you'd create extra fresh water habitats and of course aid the water supply issue.<br>Why will they not even look into this?<br>Is it by any chance because reservoirs and aquifer storage and leaving water in rivers until the tidal limit, do not give them the same return on their investment as all this infrastructure they want to build? Southern water are set to make £45 million profit from this scheme- of course they want to persuade everyone that it's necessary! Don't be fooled DEFRA!<br><br>To support their case they talk publicly about the amount of extra water we need to find by 2050. This forecast seems to have come from:<br>The very worst case scenario of demand.<br>The very worst case scenario for population growth.<br>The very worst climate forecast for droughts<br>The most severe reduction in river abstractions.<br>The worst x the worst x the worst etc leads you to pretty huge and probably unrealistic numbers which of course suit their case.<br>In fact it's 2.9 billion litres of water.<br>Is this correct that we need 5x more water in 2050 ? That seems incredible! Can we TRUST this figure?<br>We do not need huge solutions now to meet demand in 2050 - it needs a phased approach that uses sustainable solutions.<br>Fixing the leaks which accounts for 98.5 million litres per day might be a good start. With mains renewal by Southern water own figures being a shocking 1: 100 year replacement, no wonder the losses in leaks are so high.<br>More ambitious targets are needed than as at the moment by 2050 they are still looking to be leaking 10% of all treated water.<br><br>In a recent BBC article interview it was stated by a SW spokesperson that the brine by product of effluent recycling will have no effect on the harbour. This was extremely misleading to the public given that SW 's own environmental report admits that 'there is likely to be a significant effect' on the Solent protected sites.<br>Once again the issue is TRUST . How can we TRUST that SW are open and honest about the effects of this scheme and not using half truths to push it forward and hoodwink the public.<br><br>The whole TRUST issue is also an issue in the whole debacle of the Havant thicket reservoir. This was sold to the people of Havant as a leisure facility - a nature hub. Now it's basically an industrial buffer to mix the partially recycled water with spring water. I'm not saying that the water won't be technically clean but it is no longer the chalk filled spring water reservoir the people of Havant and Leigh park were promised.<br>Not only are they not getting what they were led to believe they were but the population of Havant are going to have to deal with the disruption of the huge amounts of construction which will be going on - the EF plant itself- pumping stations, shafts and kms of pipelines below and above ground. | We have considered multiple combinations of growth forecasts, climate change impacts and Environmental Destination. This was covered in Section 5 of our rdWRMP24 technical report. The range of supply-demand balance scenarios in Water Resource Zone (WRZ) as shown in Annex 11 to our rdWRMP24 technical report, covered both extremes i.e. the combination of high growth, high climate change impact and high Environmental Destination (supply-demand balance Situation 1) as well as the combination of low growth, low climate change impact and low Environmental Destination (supply-demand balance Situation 9).<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |

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| | The legacy of this project will be:<br>No or little investment in long term sustainable solutions.<br>Permanent damage risk to langstone harbour from leachate from the landfill.<br>The huge carbon footprint of building the infrastructure and ongoing carbon footprint of running it 24/7<br>The plant will be outdated in 60 years and will need replacing or updating.<br>People turning to bottled water.<br><br>I suspect this is all about making money for Southern water and I urge DEFRA to force them look at sustainable solutions. | |
| WRMP860 | Sir,<br>Protecting the chalk streams of Hampshire and West Sussex needs to be done by reducing the extraction of water from the aquifers. We are currently killing the streams.<br>The current proposal for a water recycling plant looks to me to have significant environment impacts.<br>1. Significant energy to run, condidering it will hardly ever be needed.<br>2. Increasing the concentration of sewage being pumped into the sea, including Langstone and Chichester harbour. I am a regular dinghy sailor in both these harbours.<br>3. Potential for compromising the quality of the water in the havant resevoir.<br><br>I believe other solutions should be looked into further.<br>1. Using the aquifers to store water.<br>2. Extraction of the spring water nearer to the coast.<br>3. Fixing leaks.<br>4. Joined up thinking between planning and water companies so new houses use less water by storing rainwater for certain uses. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The company Water Resource Zones do not always extend to the coast as might be expected (e.g. especially in Hampshire), as the resource zones are distinct and separate from the physical infrastructure of the Water Supply Zones. Additionally, many coastal springs are often relatively small from a public supply perspective, and such spring discharges typically show a strong seasonality and decline significantly in summer periods. Or abstractions at these locations can be more prone to saline intrusion. So coastal springs general tend to offer poorer drought resilience and security of supply. Similarly, associated coastal wetland environments dependant on such smaller springs will also be drought sensitive. However, |

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| | | such options (or those available within our water resource zones) will continue to be reviewed and reconsidered in future water plans.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, at the individual customer level. We are working with developers to recycle as much water as possible on new developments at the site level. |
| WRMP861 | Hello Defra, Southern Water,<br>. I am an IT systems manager responsible for a group of UK manufacturing companies and a Stakeholder on the Havant Reservoir Project and a Portsmouth Water/Southern Water customer. I do not represent but do speak with the support of many members of our local Havant Thicket for Nature campaign group.<br>SUMMARY<br>I would like to notify you of my concerns about the plans to recycle effluent from [redacted] sewage works via new plant located on a former refuse dump and pump it to the (not yet constructed) Havant Reservoir and then to [redacted] treatment works near Winchester. We have been told the initial cost for the recycling plant and infrastructure is estimated at £1.2 billion, and this may have already increased to £1.3 billion.<br>I have listened carefully to the Southern Water's arguments for water recycling, but I have not received satisfactory answers to our questions such as how much energy will be required to operate this equipment.<br>It has been noted that the amount of water produced from £1.2billion effluent recycling will be less than the amount of water lost to leaks on the Southern Water network. How many environmentally friendly sustainable reservoirs can be built for £1.2billion? How much of the leaky infrastructure can be repaired for £1.2billion?<br>To my knowledge, there is no environmental benefit to effluent recycling. There are many issues such as increased use of treatment chemicals, more concentrated outfall discharges, the carbon footprint and running cost for a 24x7 365 days plant that has to operate no matter rain or shine, drought or flood.<br>The recurring argument (from Southern Water), for the environmentally damaging effluent recycling project, is that it will reduce extraction from chalk streams and ground sources. We can achieve the same result by building more reservoirs, using underground storage aquifers, moving extraction points, distributing water around the UK, fixing leaks. Southern Water should be investigating cheaper sustainable solutions. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket |

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| | The UK is not a desert; we do not need costly energy intensive effluent recycling. We need to capture and store rainwater, fix leaks and install customer meters. Southern Water should spend money wisely on replacing our aging waste and water infrastructure.<br>Perhaps we need to review privatisation rules so that our water companies are able to make a small profit from repairing our aging and failing infrastructure, fixing leaks and installing meters.<br>My view is the effluent-recycling project is driven by the need to create a profit from expensive new infrastructure projects and this is wrong.<br>I attended a Portsmouth Water Reservoir steering committee meeting today and heard about long term plans to construct up to 8 new reservoirs in our (SE) region, in addition to (even longer term) plans to fix leaks and install water meters. If we build more reservoirs, capture more rain and fix leaks, we do not need to recycle effluent. The majority of reservoirs in the UK have positive environmental impact and many benefits for wildlife; many are designated local nature reserves.<br>We do not need to spend £billions on infrastructure so that Southern Water can make a profit for shareholders.<br>I do not have confidence in Southern Water's ability to deliver safe water from recycled effluent.<br>Please take this opportunity to make Southern Water rethink its plans, so that our money is spent wisely on sustainable, environmentally friendly long-term solutions that will resolve the potential/predicted water shortages. Do not approve this white elephant project.<br>Kind regards<br>Dave<br><br>ADDITIONAL CONCERNS/QUESTIONS<br>Southern Water seem to have shelved the option to complete a full review of the plan considering all alternatives stating, "A full re-appraisal exercise was not considered time or cost beneficial"<br>With ever-increasing costs, delays, significant environmental effects, the lack of legacy and short life span, the effluent recycling scheme cannot represent best value for customers<br>There may be a significant effect on the marine environment from the effluent recycling scheme. This must be investigated.<br>Why are Southern Water not investigating moving the [redacted] abstraction point to the tidal limit, as this would be a more sustainable solution to improve flow and protect the river?<br>Why have Southern Water been allowed to reject cheaper and more sustainable schemes because they cannot be delivered in time?<br>Why are Southern Water not urgently investigating and planning for additional new reservoirs, despite this being customers preferred choice?<br>Most customers are not aware of the proposed changes to our drinking water. | Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the |

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| | | tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |
| WRMP862 | Dear Sirs and Madams,<br>Please look at the SW proposals with a jaundiced eye as they seem to ignore long term strategic needs of our communities whilst attempting to accumulate tradeable assets with which they seek to justify rewarding their shareholders at the expense of real progress towards a more secure (and environmentally friendly) water management network.<br>Most notable of these areas is the long term proposals for the Havant Thicket reservoir and its associated infrastructure. Why, [ when one already knows of the failure rate, leakage, unresolved RO breakdown products, and unnecessarily long fetch and deliver ([redacted], Havant, Southampton and [redacted]) routes of the basic RO treatment system, ] are not the lower cost, environmentally friendlier, and geographically more relevant (and convenient) options acted upon - immediately!<br>Underground storage reduces losses and is more publicly acceptable, long term pollution of our HT reservoir by the RO operation is avoided, and - best of all - this singular reservoir can in future capitalise on its unique asset - being fed by NATURALLY resourced water.<br>Regards | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, starting in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. |
| WRMP863 | I wish to object to the entire approach of Southern Waters' plan<br>for providing drinking water to Havant residents.<br>It is going to be vastly expensive<br>and unaffordable for residents.<br>It completely ignores environmental and health concerns.<br>It will certainly be providing toxic and dangerous untested solutions rather than the free solutions of rainwater collection and reducing the vast number of leaks.<br>All of these concerns have been put forward to SW as sustainable and cheaper solutions which they have arrogantly ignored in the current plan.<br>The concerns of the community<br>and a huge no of specialists and researchers who have provided | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |

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| | their alternative suggestions and plans are supported by most of the consumers of the water SW intends to provide. But they have been totally ignored by Southern Water in the current plan.<br>This plan should be rejected and a plan which provides sustainable solutions insisted on. They should not be allowed to go ahead with their appalling outrageous Plan!<br>If Defra and the Government do not resist this disaster the community will be holding you to account too. | |
| WRMP864 | Dear Sirs,<br><br>I am writing as a customer of Southern Water, in response to the above referenced proposals that they have put forward for water management going forward, to insist that they develop a more sustainable plan that puts local people and the environment before profit. The mechanism by which the water industry is funded incentivises infrastructure heavy solutions, rather than development of sustainable solutions that work with climate change, and that exactly defines what Southern Water has done in response, with a plan that puts profit before customers, local residents & the environment.<br><br>It is particularly shocking that 19% of the water that customers have paid to treat is lost by leakage in the Southern Water distribution network. 100 million litres of water lost every day. Yet they do very little to manage it.<br><br>It is also frankly ridiculous that we are contemplating schemes involving technolgical solutions & installation of massive infrastucture that are incredibly costly both financially & in environmental terms & importing water from Norway, when the country is being deluged with rainfall that we only collect 1% of!<br><br>The plan virtually ignores these issues & instead appears to have been based on whatever presents as the best mechanism by which Southern Water can continue to extract money & profit from 'water management'<br><br>Southern Water's plan is taking us down the wrong path:<br><br>Southern Water's £1.2 billion scheme is taking the essential requirements of managing waste water & ensuring the consistent supply of top quality drinking water in a direction entirely to benefit Southern Water's interests. One thing our country & county doesn't lack is rainfall and it is likely to increase. We need a plan that focuses on sustainable solutions that work with climate change and are about collecting it and storing water in new reservoirs and confined aquifers for use in dry summers. Not recycling sewage.<br>It is frankly scandalous that we only collect 1% of rainfall in the UK. As well as supplying the water we need, collecting and storing more water in winter would provide multiple additional benefits such as helping to reduce forecast increases in flooding, providing recreational sites for our communitiesand biodiversity opportunities when building more reservoirs.<br>Southern Water need to be far more ambitious on leakage reduction: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver |

| Reference | Feedback | Southern Water Response |
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| | Southern Water looses a substantial amount of the water we pay them to collect & treat. Figures show that 3% of the water they take from the environment is lost before even reaching the treatment works, and an additional 19% is lost after customers have paid to treat it brcause they currently fail to effectively manage leakage in the distribution network. More than 100 million litres every day. Southern Water must be required to deliver a proper programme of renewing water mains to replace their ageing pipe network as an absolute priority or they will never get leakage under control. A replacement rate of just 1 in 1000 years when a water main is only designed to last 120 years is totally inadequate & would not be accepted as an equipment & Infrastructure maintenance & upgrading schedule in any other industry. So why is it accepted here?<br>Southern Water cannot be trusted to operate & maintain existing systems without causing pollution, what hope is there when far more complex technology and systems are involved?:<br>Customers simply do not trust Southern Water. And particularly not in the context of installing complex technology required to treat final sewage effluent, previously untried for this purpose in the UK.<br>They have an appalling track record of treatment plant and pumping station failures, many prosecutions for pollution incidents and failure to take prompt action to rectify problems.<br>Customers and residents have had to put up with the consequences and that is with the existing technology.<br>New technology and the manner of its introduction and installation presents even greater risks. Including the risk of pollution to the Havant Thicket Reservoir, which was meant to benefit and enhance our community , not just collect water, as well as damage to Langstone Harbour and the Solent. This is unacceptable<br>Southern Water need to do more to protect the environment, and develop a strategy that helps them honour their commitment to be carbon neutral by 2030:<br>Our river catchments could be protected much more quickly if Southern Water moved river abstractions closer to the tidal limit, and abstraction boreholes down the catchment, reducing the priority for abstraction reform which is driving the need for effluent recycling.<br>Long pipelines and their installation are damaging to our countryside and wildlife and are not required. Solutions need to be developed closer to where the water is needed.<br>Also, the three planned effluent recycling plants, documented for use as a ‘drought resource‘, will require huge amounts of energy, having to operate year round, even when the water is not needed, in order to maintain the ‘sweetening flow’ needed to keep the pumps, pipelines and membrane filters in good working order<br>Southern Water must explore & develop options that do not have such a high carbon and emissions footprint. We need a strategy that prioritises low energy solutions. Energy alone for the Hampshire scheme will cost more than £3 million/year. With pumping and treatment needed 365 days a year. So, costly & environmentally damaging.<br>The risks from developing the effluent recycling plant on a landfill are unacceptably high:<br>If despite all this Southern Water are to go ahead with their plan, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br>There has been inadequate publicity and consultation about Southern Water’s plan: | our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated. Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we’re ensuring that environmental considerations inform the Project’s design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England’s Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household |

| Reference | Feedback | Southern Water Response |
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| | I found out about the consultation on Southern Water's plans through a friend. They will impact on Southern Water & Portsmouth customers across the region and represent a major change to our water supply. Yet as captive customers we have been told nothing by them.<br>Customers should have been written to at every stage, involved in the process & opinions should have been properly canvassed.<br>Research shows that customers prefer more natural & sustainable solutions such as reservoirs and aquifer storage, but Southern Water have not asked, let alone listened<br>Hampshire effluent recycling scheme alone will deliver a profit of about £45 million to Southern Water, this kind of profiteering paid for by customers is not acceptable.I suspect this might go some way to explaining why customers have been largely kept in the dark.<br>Further, three of their new effluent recycling plants will be designated 'Nationally Significant Infrastructure Projects' and will bypass theLocal Planning Authority process by applying directly to the Planning Inspectorate for Development Consent Orders. So further shielding their activities from residents and the customers who pay their bills and who they profit from.<br>The plans should be rejected and Southern WayeWater required to think again and this time, consult properly with customers.<br>Regards | and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP865 | Dear DEFRA Water Resources,<br><br>Effluent Recycling Plans: Havant Thicket Reservoir, [redacted] Water Treatment and other schemes proposed across the SE of England.<br><br>Please add me to your list of OBJECTORS<br><br>The capital and running costs of these schemes are horrendous in both environmental and financial terms.<br><br>AND will further turn people to bottled water - millions more plastic bottles and unsustainable transport miles. I remember the complaints of bad taste of the water supplied by the [redacted], West Sussex). compounded by the need to heavily chlorinate the already badly tasting water due to Cryptosporidium. I understand a pipeline is proposed from Havant Thicket Reservoir to [redacted], with another from the [redacted] Sewage Treatment Works. Horsham too.<br><br>The public do not trust the Osmosis Process, which relies on a delicate membrane liable to clog up and fracture.<br><br>The Schemes, at best, are not a long-term solution requiring whole plant replacement within a few decades, and pumping vast quantities long distances 365 days a year.<br><br>A probably overlooked problem caused by the recycled sewage enrichment into Havant Thicket Reservoir is algal blooms - including the toxic blue-green algae. A longstanding, recurring | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website: https://dwi.gov.uk/water-recycling/<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment, supporting wildlife, particularly in a drought.<br><br>Regarding possible algal blooms, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This would also require the entire housing stock across our supply area to undergo modifications in |

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| | problem at Barcombe Reservoir (River Sussex Ouse) and Arlington Reservoir (Cuckmere River - Eastbourne Water) to name just two.<br><br>There are much better alternative ways to reduce water use, including domestic grey-water recycling, and dry toilets - the technology is tried and proven.<br><br>More water storage capacity is key. There are massive water-filled sand pits across West Sussex from [redacted] to Washington - a big one near me is at Minsted (Midhurst). Similarly, there are Confined Aquifers that could be pumped full during Winter and abstracted from during drought.<br><br>Unfortunately, the supposedly confined aquifer of the Ashdown Sandstone Beds at Singleton has been contaminated by the highly toxic waste - high pressure injected (dumped) by Star Energy (was IGas) from the leased site in Singleton Forest, of which the S.o.S. EFRA is the Landowner (That Lease is due for renewal in 2028). That waste fluid is highly saline, contains hydrocarbons, heavy metals, potent biocides and corrosive chemicals used to stimulate the oil extraction, and is probably radioactive. The threat of forever contamination of our vital chalk aquifer increases as the pressure and lubrication spreads in an area of geological faults and seismic activity. The annuli of the 7 oil wells also provide a pathway through the clay that separates the Ashdown Beds from the chalk aquifer - with records of cracked well casing and contamination going back to the mid-1990s ... recently Permitted by the EA to 2031.<br><br>Even more unfortunately, the Singleton situation of dumped toxic waste - including brought in by road from other sites, is far from alone. You must be aware of the public outcry over the Brockham, Surrey Application by Angus Energy to bring in highly toxic fluid waste from other oil extraction sites for high-pressure injection dumping.<br><br>Please, Please be aware that water is vital for all life. Oil is not!<br><br>With kind regards,<br><br>P.S. I must mention the dire situation of the River Ems, which dried up to a few stagnant puddles - never before in living memory in the lower reaches - due to groundwater over-abstraction at Walderton. | internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level. Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plants can be built in a modular fashion—i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms of being able to meet the anticipated demand, resilience to climate change, and delivering Environmental Destination.<br><br>We note the comment regarding the pollution of the Ashdown Sandstone Beds at Singleton.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. We will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>With regards to the status of the River Ems, please be advised that the river is located within the Portsmouth Water drinking water supply area. Groundwater abstractions which may have a potential impact on the flows of the River Ems are operated by Portsmouth Water. Please follow up with them to discuss your concerns. |
| WRMP866 | Dear Sir/Madam<br><br>I refer to Southern Water's recent revised Water Resources Management Plan which is subject to public consultation until Dec 4th 2024. This plan, amongst other proposals, promotes the recycling of treated sewage water into the drinking water system which will have detrimental environmental implications if implemented.<br>I am writing to register my strong objection to this new plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead |

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| | I supported the siting and building of a reservoir in Havant thicket but at the time it was only going to store natural spring water from the local chalk aquifers. Southern Water are now proposing to pump treated sewage water back into the reservoir and then pump this mixed water to [redacted] to reduce abstraction from the rivers in that area. This will require a new large treatment plant (to be sited on a landfill site), five pumping stations and three pipelines, one of which will be 45km long.<br>The cost of the project is expected to be £1.2 billion which, as with all major infrastructure projects, will certainly be exceeded.<br>Environmental issues<br>While it may be technically possible with a well-run plant to treat the effluent safely, I am concerned that Southern Water will not run the plant 100% effectively all of the time, especially when they know the water is going into an 'environmental buffer lake' (the reservoir) and not direct into the drinking water supply. Southern Water's track record in controlling spills and discharges gives justified concern that they will not be able to run the treatment plant without discharges of pollutants into the reservoir.<br>There is an environmental risk to Langstone Harbour from pollution by leachate from the Broadmarsh landfill site caused by the necessary piling work during construction of the treatment plant.<br>Financial<br>The cost of this project is enormous and it is not the best way to spend money and there are alternative solutions available. Apart from the capital cost, the ongoing operating costs will be very high ie treatment plant running costs and long distance pumping costs. I believe that Southern Water (Mcquarie group) and Portsmouth Water (Mcquarie links) are trying to select the most profitable solution rather than the right one<br>Alternative solutions<br>Alternative solutions have been proposed but have not been considered properly, examples being:<br>• Storage of water in aquifers or new reservoirs close to Southampton. Aquifer storage is used in the USA and there has been a successful trial in the UK.<br>• Move the river water abstraction points closer to the tidal limit to protect the whole of the freshwater catchment<br>• There are other sewage works closer to the Southampton region, requiring much shorter pipelines, and less use of energy and carbon to get the water to where it is needed.<br>• Reduce leakage in the system with a more stringent target to be achieved in a shorter time scale. If a substantial proportion of the 108 million litres lost per day were could be saved, this would go a long way towards making up the water supply shortfall. It should be noted that the current rate of mains renewal is completely inadequate.<br><br>I am concerned that these less environmentally damaging solutions which have the capability of solving the problem, have not been considered seriously.<br><br>I therefore object to Southern Water's revised Water Resources Management Plan.<br><br>Yours faithfully, | after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination, and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. |

| Reference | Feedback | Southern Water Response |
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| | | Also, the £1.6 billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector: https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector<br>It is too early to say what the outcome of that work will be in relation to future rates of mains renewal. |
| WRMP869 | Hampshire Water Transfer and Water Recycling Project.<br><br>As a Hampshire resident and paying customer of Southern Water, I strongly object to their proposals for the Hampshire Water Transfer and Water Recycling Project and urge DEFRA to reject these proposals and demand Southern Water provide a more cost effective and environmentally friendly solution to satisfy our future water demands. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company |

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| | While I recognise there are significant future water demands for Hampshire that cannot be satisfied by the existing infrastructure and abstraction from the highly threatened chalk River Itchen, I believe Southern Water's high-cost proposals are aimed at increasing their shareholder returns rather than providing a low cost, low environmental impact solution that will be of real benefit to their customers.<br><br>The following aspects of their current proposals are of particular concern.<br><br>• Southern Water has been prosecuted many times for treatment plant and pumping station failures which have polluted our local rivers and coastline. When challenged, they have been slow to respond and fix the problem. Why then, should this Company be allowed to implement a project that includes complex technology required to treat final sewage effluent with the associated risk of pollution to the internationally protected habitats in Langstone Harbour and the Solent, particularly when there is alternative low cost, low environmental impact solutions available.<br>• The current proposals require the pumping and treatment equipment to be operating for 365 days a year at a cost of £3 million regardless of the water demand. Alternate low energy, low environmental impact options that can be used as a drought resource must be brought forward to satisfy future demand. Southern Water's current leakage reduction program is totally inadequate. The current loss is greater than 100 million litres of water lost every day!<br>• The huge cost of servicing the debt for the current proposals will have to be paid for by customers while providing a profit of £45 million to Southern Water. Given Southern Water's precarious financial situation in the bond market, the financial risks associated with these proposals are unacceptable to the customers and also, I suggest to the UK Government.<br><br>I urge DEFRA to reject the current proposals and demand a low cost, low environmental impact solution. | can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP871 | Dear Sir / Madam, | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | I am writing to you to record my objection and concerns to the Southern Water proposed Hampshire Water Transfer and Water Recycling Project, and to request that DEFRA reject Southern Water plan. Southern Water should be required to submit a plan that puts the environment, threats of climate change, and customers first, before their own profits. Whilst recognising that investments need to be made in our water infrastructure, Southern Water's proposal appears to be focussed on increasing their regulatory asset base, to maximise their profits, with scant regard for the energy intensity, environmental damage and value for money. The short economic life (expected life of circa 40 years), and immense capital cost and ongoing operating cost of the proposed Hampshire Water Transfer and Water Recycling Project, which if approved, would be running 365 days a year (even when the water is not needed), is incompatible with Southern Waters stated aim of reaching net zero by 2030, and indeed the country's net zero ambitions.<br><br>In particular, I have the following concerns regarding the project;<br>1. There appears significant environmental, ecological and health risk to Langstone Harbour, by developing the effluent recycling plant and digging deep tunnel shafts that would be required, on the contaminated landfill site at Broadmarsh, which was tipped throughout the late 1960's to the 1980's with no lining over the harbour muds.<br>2. Real concern about the competency and ability of Southern Water to install and operate new complex technology to treat final sewage effluent, which has never been used in the UK for this purpose before. Given that Southern Water has a lamentable track record in operating and maintaining its existing infrastructure without causing pollution, and damage to the environment, it raises huge concerns as to its ability and competency to safely operate the new complex advanced effluent recycling treatment technology without incident or pollution.<br>3. The regular frequency with which Southern Water discharges raw sewage into Langstone Harbour, even when dry, and its criminal behaviour leading to a fine of £90m due to serious failures in the operation of Southern Water's sewage treatment sites, and the deliberate misreporting of performance information, means there is a strong likelihood of turning people away from tap water due to the lack trust, and therefore buying bottled water, thereby creating a new used plastic water bottle mountain, especially as mixed reservoir water will taste different to spring water.<br>4. Data shows that Southern Water could address a sizeable proportion of its projected water shortfall by being much more ambitious in addressing leakage reduction in its infrastructure. Data shows that Southern Water loses 3% of water that it takes from the environment, before it even reaches the treatment works, and then a further 19% is lost in the distribution network. It is worth mentioning that customers are charged for treating the 19% of water lost due to leakage in Southern Water's distribution network. Far more focus, energy and ambition is required in addressing Southern Water's poorly maintained distribution network. Southern Water's current replacement rate of their ageing pipe network is only 1 in 1,000 years. How does this credible and how does it pass scrutiny ?<br><br>I am given to understand that there are a number of viable potential alternatives, which should be investigated. We receive plenty of rain in the winter months, which could be stored for use in | Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. |

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| | dry summers. The proposed effluent recycling schemes have the highest negative impact score compared to any of the alternatives, and is not compatible with the climate and environmental targets of the country, and indeed, Southern Water.<br><br>I would be grateful if would acknowledge safe receipt of this email.<br><br>Yours sincerely, | |
| WRMP873 | We are horrified to learn that Southern Water plan to use Havant Thicket Reservoir, being developed by Portsmouth Water, for recycling treated sewage. The reservoir is just three miles from where we live and our water is supplied by Portsmouth Water. We understand there are many other ways Southern Water could deal with their sewage problem and it is scandalous that our local supply of pure aquafer water will be contaminated in this way. Think again Southern Water.<br>Yours in protest | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP874 | Dear DEFRA,<br>I am writing to formally object to Southern Water's revised draft Water Resources Management Plan (WRMP) 2024 on the grounds that it prioritises unsustainable and impractical solutions while failing to address viable, environmentally sound alternatives. Below are my key concerns, supported by academic research:<br>1. Climate Adaptation<br>The plan does not adequately address climate resilience by failing to prioritize the capture and storage of winter rainfall to mitigate summer shortages. Effective water resource management under climate change necessitates adaptive strategies to harness seasonal excesses (Götzinger et al., 2021).<br>2. Comprehensive Review of Alternatives<br>By refusing to conduct a comprehensive re-evaluation of alternatives, Southern Water risks overlooking sustainable solutions like reservoirs or aquifer storage. Research underscores the importance of exploring multiple options to ensure long-term resilience (Singh et al., 2022).<br>3. Reliance on Effluent Recycling<br>The heavy reliance on energy-intensive effluent recycling schemes conflicts with carbon neutrality goals and poses potential risks to public health and ecosystems (Sapkota et al., 2018). These schemes should be balanced with natural solutions.<br>4. Implementation Timelines<br>Unrealistic timelines for recycling projects could lead to delays or failure, jeopardizing water security. Feasible timelines are essential for effective water management projects (Jahan et al., 2023).<br>5. Unsustainable Drought Management<br>Proposals to tanker water from Norway are environmentally damaging and impractical. Sustainable water management requires local, adaptive solutions to avoid reliance on such extreme measures (Met Office, 2022).<br>6. Inflate Demand Projections<br>Overestimated population growth assumptions lead to an unnecessary focus on | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>2. Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may |

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| | controversial infrastructure instead of demand-side solutions. Accurate forecasting is critical for effective planning (Götzinger et al., 2021).<br>7. Environmental Oversight<br>Insufficient environmental assessments risk damaging ecosystems and non-compliance with legal standards. Thorough evaluations are vital to ensure ecosystem protection (Sapkota et al., 2018).<br>8. Overlooked Alternatives<br>The plan neglects viable alternatives like Managed Aquifer Recharge (MAR), which is proven effective in addressing water scarcity while protecting ecosystems (Singh et al., 2022).<br>9. Leakage Reduction Neglect<br>With 19% of treated water lost daily, addressing leakage is an obvious and cost-effective priority that the plan inadequately emphasises (Götzinger et al., 2021).<br>10. Ignoring Customer Preferences<br>The plan disregards public preference for natural solutions like reservoirs and aquifer storage, favoring less popular options. Public acceptance is key to the success of water reuse projects (Yates et al., 2021).<br>I urge DEFRA to reject Southern Water's current WRMP 2024 and mandate a revised plan that:<br>Fully explores sustainable alternatives, such as reservoirs and aquifer storage.<br>.<br>Sets ambitious targets for reducing leakage.<br>.<br>Aligns with climate adaptation strategies by capturing and storing excess winter rainfall.<br>Includes robust and transparent environmental assessments.<br>.<br>It is imperative that water management strategies balance long-term environmental sustainability with practicality and public trust. Southern Water's current plan falls significantly short of these objectives.<br>Sincerely,<br><br>References<br>Götzinger, M., Montzka, C., & Frey, R. (2021). Climate-resilient water management strategies under changing precipitation patterns.<br>Environmental Science and Pollution Research,<br>28(11),<br>12345–12358. https://doi.org/10.1007/s11356-021-14332-4<br>Jahan, F., Sarker, M. A. R., & Alam, M. M. (2023). Timeline feasibility in water infrastructure projects.<br>Water Resources Management,<br>37(2), 345–358.<br>https://doi.org/10.1007/s11269-023-03518-9<br>Met Office. (2022). Adapting water resource management to climate change.<br>Met Offic<br>Research | increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>3. For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>4. As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the Environmental Assessments for the WRMP. Work is being undertaken by our consultants to address these comments and make any necessary changes to ensure that the assessments align with regulatory requirements. We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact. |

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| | Reports.<br>https://www.metoffice.gov.uk/research/climate/climate-impacts/water-resources<br>Sapkota, P., Shields, D., & Liu, H. (2018). Sustainability challenges in wastewater recycling: An overview.<br>Environmental Science and Pollution Research,<br>25(7), 678–692.<br>https://doi.org/10.1007/s11356-018-2629-3<br>Singh, R., Yadav, R. N., & Kumar, D. (2022). Advancements in Managed Aquifer Recharge for water sustainability.<br>Frontiers in Water,<br>4(3), 234–247.<br>https://doi.org/10.3389/frwa.2022.983228<br>Yates, S., Cole, J., & Davis, M. (2021). Public acceptance of recycled water reuse.<br>Environmental<br>Conservation,<br>48(2), 145–156. https://doi.org/10.1017/S0376892921000024 | A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP875 | To whom it may concern<br><br>I am very disappointed with Southern Water's new proposal. On several issues, I object to SW's draft of the Water Management Plan.<br><br>Storing raw/rainwater water and having recreational use for the Havant Thicket reservoir provided a sustainable, all-year-round water storage facility for many potential uses and reduced the need to find water in other locations.<br><br>The UK only collects about 1% of rainwater. The proposed solution does not do this and recycles water from the [redacted] Waste Water Treatment Works to pump it to the Havant Thicket reservoir. The solution should be to improve stormwater capture and storage across the region and/or abstract water further downstream closer to estuaries where greater volumes can be captured.<br><br>Other issues with the proposal include:<br>Significant new infrastructure with huge environmental impact and damage where more simple schemes would suffice. See below<br>The new builds would require running costs leading to higher customer bills, increasing SW's net worth and share price but not providing a cost benefit to the customers.<br>For example | Thank you for reviewing our rdWRMP24 and providing feedback.<br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be |

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| | The SW Broadmarsh ERP is on the coast, perhaps 10 -15m above mean sea level. Havant Thicket is over +25m above this. Constantly supplying and pumping 365 days/annum, even when not needed, is hugely energy-demanding and wasteful.<br>SW also intends to pump treated effluent up 90m to Portsdown Hill, gravity feeding it to a Water Treatment Works over 40km at [redacted], increasing energy demand even further.<br>SW is not constructing an ERP for PW customers, so Havant Thicket's approval to take recycled effluent was not granted. The fundamental purpose of the original application for a reservoir for raw water storage has significantly changed. Effectively, SW attempts to subvert full public engagement by using Havant Thicket for another purpose.<br>According to SW, in their July and August 2022 initial consultation on recycling "dirty" into "treated" water pumped to Havant Thicket, they had PW's approval. This is contrary to how it was conveyed in 2020.<br><br>Add in the UK's Net zero Carbon emissions target for 2050. Why would anyone consider pumping 365 days a year—an extremely expensive process?<br><br>PW does not intend to monitor water quality in its new Reservoir but instead relies on SW. Water Quality requires independent monitoring.<br>SW has a poor reputation for fixing leaks, currently at a rate of 19%, and therefore cannot be trusted with these large-scale infrastructure projects until they prove they can fix the waterworks. An organisation that has been fined £ 90 million in the past due to repeated illegal effluent discharges does not inspire confidence in upholding the very high maintenance requirements needed to ensure that the new reservoir is not polluted.<br><br>The financial burden to SW consumers of a new ERP at Broadmarsh and pipes to Havant Thicket Reservoir is now £1.2 to 1.4 billion or £30/annum per customer.<br>Three Winter storage reservoirs could be built for the Broadmarsh ERP (the estimated cost for the construction of the Havant Thicket Reservoir is £350 million).<br>In the meantime, the [redacted] Water Treatment Works is not expected to be served by Broadmarsh until 2035/40, and in drought conditions, it could rely on Oceangoing Tankers from Norway.<br><br>What a crazily expensive and emission-rich solution when a rethink of the project could solve all of this.<br><br>SW's [redacted] [redacted] persistently fails. It discharged raw sewage into the "Protected" Langstone Harbour for 181 hours in the eight days between 24 October and 1 November 2024. This is not a new failure.<br><br>SW can earn profits from investing in new infrastructure but not from maintaining pre-existing infrastructure—perhaps the fundamental reason for this mammoth planning process resubmission. | ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie |

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| | In summary, DEFRA should not authorise the grant of a Development Consent Order for an Effluent Recycling Plant at Broadmarsh that, for the many reasons stated, does not provide an economic or environmental benefit.<br><br>Regards | Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP876 | We are Emsworth residents and would like to voice our serious concerns and outrage at the proposal to use recycled sewage effluent to top up our water supply, and to build a treatment plant at the landfill site at Broadmarsh.<br><br>There has been a total lack of public engagement and transparency about this whole project (failure to publicise and withholding documents etc), and we feel strongly that Southern Water is ignoring public health and environmental interests and riding roughshod over the interests of the environment, local residents and consumers in their pursuit of profit.<br><br>One of the features of climate change is increased rainfall, and therefore lack of water is not a problem - it is a matter of collecting more water in winter, and storing it in a way that enhances the environment by encouraging biodiversity and recreational use rather than adversely affecting the surrounding area and beyond.<br><br>The positioning of the treatment plant in an already polluted location will not only cause a significant environmental risk to the waters and shoreline around Langstone Harbour, but it will also be a structural eyesore. The methodology is also energy intensive. Rather than trying to foist recycled effluent on the population, the local water companies should do more about addressing leaks and investing in upgrading their supply networks.<br><br>From a heath perspective, we are extremely worried about consuming water that has recycled sewage in it. We already use some bottled water for drinking, and if we knew that our water contained effluent, then we would need to buy even more bottles of water (increasing use of plastic) so that we did not have to use tap water for cooking purposes. Given their track record on pollution, we cannot trust Southern Water (or indeed Portsmouth Water) to guarantee that our drinking water is free from harmful sewage by-products such as microplastics and chemical/medication residues etc.<br><br>For a number of reasons, including those stated above, we would like to register our strong opposition to Southern Water's plan and request that it be rejected outright by Defra. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>The water recycling plant will be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements. |

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| | | Regarding storage of rainfall, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding your concerns about environmental risk, A consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. We are planning to go beyond the Government target and reduce leakage 53% by 2050. We will be looking at emerging technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP877 | Dear Sir / Madam,<br><br>Firstly, Southern Water should not have a license to operate.<br><br>I am writing to you to record my very strong objection and to raise concerns to the Southern Water proposed Hampshire Water Transfer and Water Recycling Project, and to request that DEFRA totally reject Southern Water plan. Southern Water should be required to submit a plan | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, |

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| | that puts the customer and environment, threats of climate change, first, before their own profits ( which are far too high). Whilst I recognise that investments are needed to be made in our water infrastructure, Southern Water's proposal appears to be focussed on increasing their regulatory asset base, to maximise their profits, with very little regard for the energy intensity, environmental damage and value for money. The short economic life (expected life of circa 40 years), and immense capital cost and ongoing operating cost of the proposed Hampshire Water Transfer and Water Recycling Project, which if approved, would be running 365 days a year (even when the water is not needed), is incompatible with Southern Waters stated aim of reaching net zero by 2030, and indeed the country's net zero ambitions.<br><br>In particular, these are my concerns regarding the project;<br>1. There appears significant environmental, ecological and health risk to Langstone Harbour, by developing the effluent recycling plant and digging deep tunnel shafts that would be required, on the contaminated landfill site at Broadmarsh, which was tipped throughout the late 1960's to the 1980's with no lining over the harbour muds.<br>2. Real worry about the competency and ability of Southern Water to install and operate new complex technology to treat final sewage effluent, which has never been used in the UK for this purpose before ( although they have given mis information regarding this at a previous time ) . Given that Southern Water has a lamentable track record in operating and maintaining its existing infrastructure without causing pollution (sewage for life on seas and rivers!) , and damage to the environment, it raises huge concerns as to its ability and competency to safely operate the new complex advanced effluent recycling treatment technology without incident or pollution.<br>3. The frequency with which Southern Water discharges raw sewage into Langstone Harbour, Chichester harbour and surrounding seas even when dry, and its criminal behaviour leading to a fine of £90m due to serious failures in the operation of Southern Water's sewage treatment sites, and the deliberate misreporting of performance information, means there is a strong likelihood of turning people away from tap water due to the lack trust, and therefore buying bottled water of which I will do, thereby creating a new used plastic water bottle mountain, especially as mixed reservoir water will taste different to spring water.<br>4. Data also shows that Southern Water could address a sizeable proportion of its projected water shortfall by being much more ambitious in addressing leakage reduction in its infrastructure. Data shows that Southern Water looses 3% of water that it takes from the environment, before it even reaches the treatment works, and then a further 19% is lost in the distribution network. It is worth mentioning that customers are charged for treating the 19% of water lost due to leakage in Southern Water's distribution network. Far more focus, energy and ambition is required in addressing Southern Water's poorly maintained distribution network. Southern Water's current replacement rate of their ageing pipe network is only 1 in 1,000 years. How is this this credible and how does it pass scrutiny ?<br><br>There are many viable potential alternatives, which should be investigated. We receive plenty of rain in the winter months,( especially with global warming) which could be stored for use in dry summers. The proposed effluent recycling schemes have the highest negative impact score | which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. |

| Reference | Feedback | Southern Water Response |
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| | compared to any of the alternatives, and is not compatible with the climate and environmental targets of the country, and indeed, Southern Water.<br><br>Yours Sincerely | |
| WRMP879 | Dear Sir/Madam<br>I wish to object most strongly to this revised Draft Water plan by Southern Water and ask that Defra reject it.<br><br>My main objections are :-<br>1. Mixing effluent with drinking water should be a last resort rather than a first.<br>2. Not making the most of capturing and storing rainwater is a major omission from any strategic plan.<br>3. The plan involves continuous pumping of many millions of litres of effluent/water over many kilometres and as such is energy hungry and environmentally unfriendly.<br>4. The plan does not prioritise reducing leakage and usage as fully or as quickly as it should.<br>5. The strategy should be to make more use of assets like the new Havant Reservoir or natural aquifers. As a regular local walker in this area, I feel that this facility should maximise the local nature of this area for the enjoyment and well being of local residents. I understand that the planned mixing of effluent into the Havant Reservoir will result in algae growing there and undermining the leisure usage that was a key component of its initial justification.<br>6. I recognise that any solution will be hugely costly but it appears to me that the planned expenditure is being misdirected and so will result in a HUGE mistake which our children and grandchildren will have to bear the brunt of and also rectify.<br><br>Yours sincerely | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br>2. Regarding storage of rainwater, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth noting, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>3. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply reducing the water abstracted from the environment supporting wildlife and the environment.<br>4. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>5. Regarding possible algal blooms, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |

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| WRMP881 | Dear Sirs,<br>I am writing to complain about Southern Water's Effluent Recycling Plan.<br><br>• Why is SW not collecting more rainwater and storing it? We get enough rain during the year to cover the dry periods.<br>• I am particularly concerned about the environmental impact of the new facility that is planned. This is an area of outstanding beauty and to have a large recycling plant built at Broadmarsh is unacceptable. The need for new outlets into the harbour is also a major concern.<br>• There is already pollution from your sewerage farm at Broadmarsh that affects the water in the harbour. This new recycling plant, as I understand, will be discharging effluent 4 x more concentrated. People like to swim and sail in the harbour, and they do not want to be swimming in sewerage! This is already a major issue for the harbour and this project will only make it worse.<br>• I understand the treated water is destined for [redacted] some 30+ miles away. A ridiculous solution when there are places much closer to [redacted] to service this town's water needs. The cost in energy to transport water this distance is huge. You should be reducing energy usage, not increasing it. This country already has a problem with electric energy and this recycling plant will use huge amounts of energy. There must be an alternative.<br>• I understand the cost will be over £1 billion. I do not b eleive this will provide the customer with value for money. It will take many years to recover these costs in ever. Why not use the money to invest in new reservoirs benefiting the environment and communities. This would provide a long term solution and not become redundant in 60 years.<br>• Where is the public consultation for the project? I have seen nothing!<br>• When customers start receiving recycled water from Portsmouth Water many will turn to bottled water. They do not trust Southern Water whom already have such a bad track record.<br>• When is SW going to repair their leaking pipes? If this was a priority there would be less need for a recycling programme.<br><br>I could go on, but as you can see, I have no faith in Southern Water. They have failed to provide effective sewerage treatment and polluted the sea for years and often hiding the fact. They have not prepared the sewerage farms to cope with the extensive new builds in the area. There has been minimal consultation wit the public, maybe this is a deliberate ploy. Who knows?<br><br>The community deserve a sewerage system that is environmentally friendly and not one that negatively impacts the environment, our fresh water supplies and uses excessive power to run. A system that they can live and be proud of.<br><br>Regards, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Portsmouth Harbour WTW is already in existence. The water recycling plant will be sympathetic to Broadmarsh Coastal Park and views from Langstone Harbour without compromising functional or safety requirements.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Our estimated cost for Havant Thicket Reservoir is included in our Water Resources Planning tables.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A. |

| Reference | Feedback | Southern Water Response |
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| | | We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP882 | I am emailing to object about Southern Water's Plans for Effluent Recycling and water management.<br><br>The effluent recycling scheme is wrong on every count -<br><br>1. It will require a huge amount of infrastructure and as I understand it only has a 60 year lifespan which is hardly a sustainable option.<br><br>The proposed Broadmarsh site is unsuitable for the proposed plant. building on an old landfill site with a risk of contamination to Langstone harbour because of the deep shafts needed is not right, particularly as there are other more suitable sites. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>**1.** Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations, the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long-term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br>**2.** Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm |

| Reference | Feedback | Southern Water Response |
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| | 3. The energy costs to keep the plant running 365 days a year are not a sustainable option.The carbon footprint will be massive.<br>4. Southern water should be looking at more sustainable options i.e developing options that collect winter rainfall to use in dry summers and fixing leaks - 19% of all water that Southern Water abstracts is lost through leaks.<br><br>5. The plan to tanker water from Norway as part of the drought plan is foolish. I can see a problem with alien plant and animal species being introduced, plus how can you schedule tankers as you don't know when a drought will happen and what an in-efficient way of trying to resolve the problem.<br>6. The environmental impact of of concentrated reject water discharge from this plant into The Solent is a big concern.<br>7. Also the impact of adding recycled water into a chalk spring fed reservoir are unknown. It could have a huge impact on biodiversity.<br><br>Please Stop and have further consultation on more sustainable ways of feeding the new reservoir that are sustainable well into the future and are less energy intensive.<br><br>Can you please confirm receipt of this objection.<br><br>I look forward to hearing from you.<br><br>Best wishes. | strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br>**3.** Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>**4.** The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>.<br>**5.** Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>**6.** A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>**7.** A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. This work will include evaluation of the potential impacts of introducing purified recycled water into a chalk spring-fed reservoir and on associated biodiversity. |
| WRMP883 | Hello : To whom it may concern<br><br>I am extremely concerned about Southern Water's plans to recycle effluent into the proposed Havant Thicket Reservoir. The reservoir, which is most definitely needed, was granted planning | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |

| Reference | Feedback | Southern Water Response |
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| | permission on the basis it would be filling from Bedhampton Springs and no doubt some winter rainfall too.<br><br>Southern Water appear to have changed the plan entirely and are now intending to ship water from the treatment plant at [redacted] through 40km of new pipework through the very precious eroding limestone. This is one of the best examples in the country of this geology and extreme caution should be taken. In Three Rivers District planning permission was given for a warehouse which involved extensive piling into an acquifer, and whilst the developer assured that extreme measures would be taken to prevent any contamination and damage, the River Colne has already experienced a serious pollution incident which is being investigated by the Environment Agency. This work is on a small scale, compared to what is being proposed by Southern Water. Mistakes will be made and the results everlasting. Do not allow such a national treasure to be destroyed.<br><br>Southern Water are also proposing to import water from Norway in times of drought. This is exceptionally concenring too, and should never be permitted. The risk from invasive species, a change to water chemistry, disease transmission not to mention the carbon cost are too great a risk to allow.<br><br>Given the extensive winter rainfall we are experiencing as a consequence of climate change we need more properly considered storage solutions. We only save 1% of rainfall, and 25% of Southern Water's output is lost to leakage. So Southern Water should be made to store more and stop the leaks, using the existing systems to transport water.<br><br>Finally we supported the Havant Thicket reservoir on the basis that is needed, and our water supply was going to come from Bedhampton Springs. Now it turns out we will be drinking recycled sewage, which with the best treatment in the world will be unable to remove the horrific amount of forever chemical in our water. The Clean Harbour Partnerships citizen Science projects has revealed more than 50 chemicals in the local harbour waters. Clearly these are not being screened through the treatment, so will the new water treatment plant be 100% confident it will be able to remove them. The risk to health if this goes ahead is huge, and will result in a huge cost to the NHS. A problem caused by Southern Water - why should the taxpayer foot the bill?<br><br>I would urge you to put huge pressure on Southern Water to find a safe solution for residents and the environment. This proposal is dangerous to all.<br><br>Kind regards | The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>The majority of the pipelines will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP885 | Dear Water Resources,<br><br>I am writing this regarding the proposed plan to recycle sewage in Hampshire county for use as drinking water. | Thankyou for reviewing our rdWRMP24 and providing feedback.<br>**a.**<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 |

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| | I have worked in environmental health, environmental toxicology and chemistry and research on compounds not removed by sewage treatment. I have worked in this field all over the world since 1988.<br><br>There are a several key issues around the proposed project that present huge problems:<br><br>a. Recycling of sewage is done elsewhere, but these countries do not already have water sources, such as abundant rain. The technology required to get the water to a drinkable stage is energy-intensive and technical.<br><br>b. The reverse osmosis proposed to remove the remnant contaminants after traditional sewage treatment does not remove 100% of the compounds that have effects at low concentrations and persist in the environment.<br><br>c. The location for this treatment plant is on a historical landfill. To build anything on a historical landfill, a lot of drilling down through the landfill is required to ensure the varied settling known to occur on landfills does not damage the buildings. This drilling will be through unknown material potentially containing PCBs, DDT, old batteries, or any other toxic compound that could enter the surrounding waters. In addition, tunnelling through many areas of the landfill will have negative environmental and community impacts.<br><br>d. The location is also a problem because it is 40 km from where the water will be used. Once again, you have an energy-intensive problem of pumping the water constantly.<br><br>e. The treatment is presented as a solution for removing persistent organic pollutants known to have ecological and human effects. However, it won't because the concentrated solution of chemicals that the RO membrane will filter out is going to be released from the SW sea outfall. The plume map of these releases has been shown to reach the bathing waters off Hayling and the harbours. In addition, windsurfers, kiters and wingers frequent the water around this outfall. There is also wildlife out there that will be affected by the concentrated toxic slurry.<br><br>f. There are several other options, such as using more reservoirs or subterranean aquifers to store the abundant rainwater, that are currently ignored.<br><br>g. The infrastructure required to implement this system is enormous and extremely expensive. The other options are cheaper. | million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br>**b.**<br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br>**c.**<br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br>**d.**<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br>**e.**<br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br>**f.**<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | | **g.**<br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2. |
| WRMP886 | I absolutely do NoT consent to this. It is disgusting, they're already destroying our seas and now want something which wa senna tti be for spring water- they want to contaminate that too. Vile. I do not consent | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket has been noted.<br><br>A key benefit of the reservoir is the ability to store recycled water ahead of and during a drought. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |
| WRMP887 | I wish to express my concern regarding the Southernwater plan to mix Recycled Waster water with drinking water stored in the new Thicket reservoir at Havant.<br><br>Southernwater do not have the capability to adhere to regulations and standards as they have consistently demonstrated over the past years. Their performance fails to improve.<br><br>The risk of contamination is far too high. Has the probability of pollution in the reservoir due to Recycled Water being added been modelled and analysed independently?<br><br>Has there been thorough analysis of the benefits of recycled waste water versus a less risky option of just desalination, as and when required.<br><br>Southernwater seem very keen to implement recycled waste water processing as a means of relieving the need to apply for Drought Permits. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP888 | As a resident of Havant. I am still concerned that Southern water intend to pollute the new reservoir being built by Portsmouth Water with sewage and pay to import water from Norway to dilute the sewage.<br><br>Southern Water are now also intending to pollute the new Havant Reservoir and rivers in Sandown in the Isle of Wight and Littlehampton.<br><br>Langstone Harbour has been overused for dumping raw sewerage until the harbour was recently monitored and have reduced their output, although any dumping of raw sewerage is too much<br><br>We pay and have paid for years to Southern Water to treat our sewerage. Not give money away to share holders or big salaries for poor management.<br>They now want to charge us more to renew their treatment facilities. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

| Reference | Feedback | Southern Water Response |
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| | Why have they not done this earlier, they know population generally increases producing more waste.<br><br>Please do not allow Southern water to pollute a good source of water for the Havant and wider area | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP889 | I strongly oppose this revised proposal for many reasons.<br><br>1.<br>It would waste enormous resources for water transference, pre and post water treatments, for storage and for delivery to homes. Worse when you include the carbon footprint transporting water from Norway which could compromise national water security.<br><br>2.<br>Vast areas of land and water would be disturbed during and around the pipeworks, development, treatments and storage. Adding to all the deforestation around the Thicket reservoir, housing and other infrastructure locally.<br><br>3.<br>The proposal would allow several boreholes to be driven directly through old waste landfill at Broadmarsh. This landfill lies over a concealed chalk river and already leaches into SSSI areas. While SW have discharged sewage into Langstone 1114 times just to October 20 this year. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2. We are no longer including sea tankering within our plan.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated. Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects. |

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| | 4.<br>There are other more sustainable and sensible options which would be quicker and easier to develop, be less intrusive and damaging to eco systems, and certainly cheaper and more reliable for the future, if sited differently and nearer to the river mouth.<br><br>5.<br>Southern England is surrounded by water, and has plenty of rainfall which could be harvested in Aquifers, water towers and reservoirs. Water butts as a trial in gardens, have shown they helped considerably on the Isle of Wight. Natural gardens all help absorb excess water, filter and cool without overloading drains.<br><br>6.<br>It is extremely worrying about the content and quality of water entering and leaving the reservoir. Many species rely on a stable pH, and temperature, and won't tolerate a mixture of chemicals, heavy metals, viruses or PFAS depending on what is permitted in the reservoir water will determine if organisms thrive, survive or die out. What if water from Norway accidentally transfers non native species here.<br><br>7.<br>The extensive pipework will increase risks for leaks and saline will have negative impact esp on Victorian pipes already known to leak. | 3&4. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>2. 5.Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of 'serious water stress', see here. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>6. Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other |

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| | 8.<br>Water monitoring will make bills fairer. Those with swimming pools, hot tubs or who waste water should rightfully pay more.<br><br>9.<br>Perhaps more could be done to capture grey water. More green roofs, living walls, natural grass instead of plastic and greener towns and cities. | elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>7. The new pipes constructed as part of the HWTWRP project will be new and subject to much lower rates of leakage than older pipes.<br><br>8. We agree that metering is the fairest way to charge for water and already meter the vast majority of our customers. In addition, we plan to conduct tariff trials once our smart metering plan is implemented and we have a better understanding of the way demand varies daily and seasonally along with key household attributes (property type, household composition, socio-demographic variables etc). This will help us select a representative sample as well as an appropriate tariff model (rising block, reducing block, seasonal) to test.<br><br>9. You may be interested in Clean Rivers and Seas Plan \| Southern Water. In addition, we provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level. |
| WRMP890 | I am writing to object most strongly to Southern Water's Resources Management Plan proposal of recycling effluent water for domestic use.<br>It appears that SWs plans are the most expensive of a number of options and that these cheap options have not been fully evaluated or seriously considered.<br><br>The current plan seems to be the most environmentally damaging option as it involves, amongst others, a need to lay a pipeline for many miles through East Hampshire. This would, apparently, involve damage to the South Downs National Park. Less environmentally intrusive options seem to be available involving better rainwater capture.<br><br>The Southern Water plan is also aesthetically unacceptable. The population expects clean, healthy and palatable water sourced 'naturally' not from effluent, presumably sourced from accessing the public drain and sewage system. no matter how wonderfully treated, there is the knowledge that what we are bathing with and drinking is, in effect, cleaned up sewage. And what happens when a purification breakdown occurs? I leave that to your imagination.<br><br>Can Southern Water be trusted to behave in an ethical and transparent way? The answer seems to be NO. Recent history indicates that its, as well as other water companies priorities, lay in satisfying its shareholders rather than managing its responsibilities to its customers. It would appear the SW has deliberately limited access to important documentation regarding this project and has only publicly displayed it's plans at the SW headquarters thus denying most of their customers a chance of scrutinising what they want to do. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated.<br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we’re ensuring that environmental considerations inform the Project’s design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

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| | Any plan for managing 'life necessary' resources that will have implications for many generations to come have to be implemented only following the closest scrutiny in terms of social, financial, environmental, health and overall public welfare grounds. This project does not appear to me to come anywhere near qualifying in any of those areas, I therefore urge you, as custodians of this part of our future, to throw this plan out and thoroughly review any further proposal from this company. | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP891 | I object to Southern Waters draft plan for future water demand as it is definitely not a sustainable solution for the future and, in my opinion, seems to have been devised to increase their profit associated with unnecessary development of capital assets. I also have no confidence in Southern Water providing an operational effluent recycling plant in the proposed timescale.<br><br>It is important to consider that only 1% of rain water is captured for consumption purposes and that 19% of the captured water is lost due to leakage.<br><br>I suggest there are better solutions such as: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>Regarding storage of rainwater, our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | a) Move the abstraction in the Rivers Ardur and [redacted] to the tidal limits in order to obtain more water and at the same time protect the river ecology. All river abstraction should be moved to the lower catchment areas.<br><br>b) Investigate and install more aquifer storage solutions. Using the excuse that water supply may not be available during times of drought is bad planning or perhaps a means of putting off solutions until it allows a more profitable, but unsustainable, solution to be proposed. This type of approach should not be permitted by the UK Government. | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth noting, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>a) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |
| WRMP892 | I am responding to your consultation about the proposed effluent recycling plan of Southern Water.<br>It seems to me to be a complete waste of money to dig up so much of nature, pump uphill at great cost and to put facilities pile driven into a waste dump which will cause so much pollution. I am a sea swimmer and I do not think this plan will help despite all the investment. I do think the tap water I drink will never be so clean as from a reservoir fed from a natural source.<br>The disturbance is going to affect so much wildlife such as the Brent geese. Please reconsider and look at the other options, starting with fixing leaks. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Impact from construction of the pipelines will be temporary. All land used for the construction of pipelines will be reinstated. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. Water quality impacts in the reservoir and in the reject water released is also part of |

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| | | the ongoing Environmental Impact Assessment. This is expected to be submitted later in 2025. |
| WRMP893 | I'm concerned that you're company is not only breaking the law, but also giving the government the runaround, not giving a rats arse for what the public thinks,& that you put your share holders above everything else including the environment! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br><br>Ofwat regulates the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP894 | The original plan for the new reservoir at Havant Thicket must be retained. There is no need for recycled effluent to be added to the natural water being retained at this site.<br><br>Please make sure that Southern Water's ridiculous and unhealthy plans do not take place.<br><br>Portsmouth Water do not need additional recycled water added to their supply. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. |
| WRMP895 | As a resident of Hayling Island I object to Southern Water's revised plan to recycle sewage into the proposed Havant Thicket reservoir. I feel there are better alternatives such as storing more winter rain in reservoirs & aquifers for use in dry summers.<br><br>This plan goes against the Local Planning Authority consent for construction of the reservoir and operation which is conditional on the reservoir being filled with 'raw water' sourced from the company's local chalk-fed freshwater springs.<br><br>There is plenty of winter rain, to provide plenty of water, otherwise why would Southern water be discharging sewage onto our local beaches so often?<br><br>There is a large trust issue here. Up until recently, we expected to get water from out of our domestic taps which was safe for young and old alike. Now we find that all water sources have some level of PFAS which have been linked to cancer, kidney disease, liver problems, immune disorders, birth defects and other serious health problems.<br><br>There will be an enormous carbon impact during construction of the facility and pipelines to and from the reservoir. The facility will need to operate all year round, not just during a drought as the membranes will need to have a constant flow of water to maintain the membranes. This will mean energy wasted all year, not just during a drought. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket |

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| | There will be an environmental impact as people realise their drinking water is being changed from chalk stream water to recycled sewage. Many will opt to change to bottled water which will have a huge impact on plastic bottle usage.<br><br>There seems to be no provision of the publication of test results of tapwater in the areas affected online so we will be possibly be paying more to imbibe eg more PFAS, forever chemicals, without being aware of the danger. There are already several sites of high PFAS around Portsmouth, so having sewage cycling back from higher areas into chalk stream waters seems like a very bad idea.See https://www.eea.europa.eu/en/european-zero-pollution-dashboards/indicators/treatment-of-drinking-water-to-remove-pfas-signal for map of sites. While the potential of various technologies to remove PFAS from drinking water has been widely demonstrated in the laboratory or in pilot projects, they have not yet been proven to remove the full range of PFAS in drinking water when used more broadly, so once you have contaminated the reservoir, it is toxic forever.<br><br>Please look again at the true environmental impacts of this revised plan and refuse permission. | reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |
| WRMP896 | I have read the documents and their analysis, and noted the arguments put forward by Friends of the Earth Havant.<br><br>Thank goodness these environmental concerns are being raised, as well as concerns about the costings.<br><br>All aspects of these proposals will impact on the population served by Southern Water, as well as more local providers like Portsmouth Water<br><br>I do not have the expertise to evaluate the findings, but as a lay person I can tell you about the impact that Southern Water's practices have had on me and my family. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability, environmental impact and costs are key criterion for including options in our plan.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: |

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| | 1. We did not swim in the sea at Southsea this year, as there were repeated releases of sewage throughout the summer - heavy rainfall or not.<br><br>2. This year we have noticed a deterioration in the quality of our drinking water. We have now bought a jug water filter but are concerned about the plastic waste from the replacement filters.<br><br>3. Bottled water may be our only alternative.<br><br>Please make a robust examination of this plan, and work together to implement a better solution which will not have negative impacts on the environment. | https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>1. As set out in our 2023-24 annual report water quality compliance at our reservoirs is currently at 99.9%. We strive to improve this and are regulated by the Drinking Water Inspectorate (www.dwi.gov.uk).<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |
| WRMP897 | My concerns about SW plans are summarised below:<br><br>Effluent recycling was proposed primarily as a drought resource, yet Southern Water have indicated that they will operate the plant and pipelines at a capacity of 30 million litres every day. Think of the huge amount of treatment chemicals and energy that will be needed to treat and pump what is 12 Olympic sized swimming pools of water everyday 40km to [redacted], even when it is raining and we have plenty of water.<br>Note: To keep the treatment plant and pipelines in operational order Southern Water must operate the plant at a minimum flow of 20Ml/day (8 Olympic size swimming pools).<br><br>Southern Water have confirmed that the effluent recycling treatment plant alone will use energy at a rate of 0.95kWh/m3, with the additional water treatment still needed at the [redacted] works taking 0.457kWh/m3 (1m3 = 1000 litres and they plan to treat 30 million litres per day). The energy consumption and cost of treatment for the recycled water are therefore 3 times higher than that of conventional river water treatment.<br><br>That does not include the costs to pump the recycled water 4km to Havant Thicket Reservoir, nor the cost to pump the mixed water 40km to [redacted], which must be huge, given a 90m vertical height rise just to the top of Portsdown Hill. Southern Water have previously said they cannot provide the energy figures for pumping water along the pipelines. Given that the daily energy cost of water pumping will be extremely high how have they determined that this is a 'best value' solution for their customers without this information.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order application. The energy usage information used to support that will be appended to the assessment.<br><br>Energy security is already a significant concern in the UK, selecting and developing high energy solutions to meet our water supply needs will just add to the national & regional problems, and those of the planet.<br><br>This is not a sustainable way forward. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. |

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| | | We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |
| WRMP898 | I object to Southern Water plans for a water recyling plant near Langstone Harbour.<br><br>I don't believe SW have done proper work to develop a range of options. In particular:-<br><br>Aquifer Storage of water during times of glut.<br>Moving water abstraction to the mouth of the rivers (that may be called "tidal reach point")<br>Additional reservoirs<br>Leak reduction actions<br>Water use reductions measures. (Not sure there is "off peak water" but the energy utilities may have something to learn from here. They even subsidise more efficient boilers and insulation. What's the water equivalent?<br><br>I believe their option of tankering water from Norway demonstrates their lack of complete review of the options available and their complete disregard for the environment (and the size of customer bills).<br><br>Further I believe SW cannot be trusted with the environment cf. their record with sewage discharge. Building the works would have unacceptable environmental impact and risk leakage from historic waste dumps they plan to build upon into the harbour. Unmanaged and unknown dirty water release is almost certain given their track record. They cannot be trusted to self measure and self regulate. I am confident you will find a long list from environmental groups. We all have favourite sources but if you want somewhere to start try https://havantmatters.org/<br><br>It seems to me SW are incentivised by their statutory set up to build infrastructure rather than repairs and innovate (as examples). They want a billion pound plus plant rather than a "few" 100 million reservoir for financial reasons not water supply reasons.<br><br>Further - they are owned by Macquarie. Didn't they take Thames Water to it's knees by taking excessive dividends and load the company with debt?<br><br>I believe SW are using water consumption predictions (and changing them to suit) to support their case. Even a previous Director (Bill Sitting) opposes the plan. (Source https://www.theguardian.com/environment/article/2024/jul/13/12bn-plan-to-turn-sewage-waste-into-drinking-water-branded-a-dangerous-white-elephant) | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan. |

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| | Please reject this proposal and ask SW for a comprehensive review of alternatives and to bring back proposals including the suggesting I have made as a minimum. | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP899 | I attended a meeting recently at Merchistoun Hall, Horndean about the above proposal.<br><br>Please record that I object to Southern Water recycling effluent water for drinking, washing and general public use.<br><br>I am appalled that Southern Water are considering this as an option. Please read my following points:<br><br>1) This is a backward step for the environment and biodiversity.<br><br>2) Most probably will cause a surge of people buying bottled water to drink which will increase household bills, increase carbon footprint and moreover damage our precious planet. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>We note your objection to the water recycling scheme.<br><br>1) Southern Water is developing four water recycling plants across our region and several other water companies are also planning to use the technology to help reduce abstraction form the environment and maintain public supplies. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided |

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| | 3) No public consultation has been made in all areas which would be affected by Southern Wate to raise awareness to this proposal.<br><br>4) The plant does not have longevity.<br><br>5) The plant would cost a huge sum of money.<br><br>6) The plant and pipes would cause considerable damage to wildlife and detrimental to the future of biodiversity. For example the birds at [redacted] would not return for decades.<br>7) The building of such an enormous plant would cause congestion and safety to the general public.<br>8) As far as I am aware no other water supplier in the UK has or is pursuing this form of clean water supply.<br><br>9) The UK has a very high amount of rainfall, why do we need to recycle effluent water?<br><br>10) Reservoirs are cheaper and last longer and will not damage our precious chalk streams.<br><br>11) The general public have not been informed about this. | further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br>2) Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br>3) With regards to your comments about the consultation: In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br>4) With regards to your concern about lifespan of Havant Water Recycling Plant, we are planning to build new reservoirs where feasible (see below). However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought.<br>5) We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor.<br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>6) We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br>7) We note your objection to the risk of congestion from building the plant.<br>8) Other companies in the UK are either exploring or planning to develop water recycling options. For example, Thames Water is an option called Teddington Direct River Abstraction. This is a new abstraction from the river that is supported by water recycling.<br>9) Regarding your suggestion about rainfall capture, in addition to reservoirs (considered above), we also promote the use of water butts, including offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>10) With regards to reservoirs: Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two |

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| | 12) Residents of the area have not seen any evidence about the long term affects drinking and using effluent water will have on humans and animals (many households have pets) including the mammals, insects, birds that live in the region.<br><br>13) People who are immunocompromised, elderly, unwell, pregnant, children - no evidence has been shown if this could make them more ill/cause diformity.<br><br>14) The NHS is already under extreme pressure long term affects of drinking and using effluent recycled water will impact on the NHS resources.<br><br>15) How can Southern Water suggest to ship over container ships of water from Norway as environmentally friendly?<br><br>16) The ships may not be able to dock at Southampton at short notice due to all the cruise ships.<br>17) The carbon footprint of transporting the water is astronomically huge.<br><br>18) The water from Norway does not have the same minerals as this area.<br>19) The [redacted] area of household waste was not secured from leaking. There is no guarantee that the many pipes drilled into the ground through the waste will not leak. This in turn will cause waste to enter into the clean water system.<br><br>20) Pipes which will run next to the river Test could over a time become weak and leak, this will cause the dirty water to contaminate our unique chalk rivers and streams. In turn killing fish and wildlife.<br><br>21) The water will taste different and the Havant Spring water will be irreovocably changed as minerals removed in the recycling process will not be replaced. | reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br>11) See response for 3)<br>12) A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br>13) The legal standards for drinking water are set down in The Water Supply (Water Quality) Regulations 2016, which include schedules of parameters which water companies are required to monitor to verify drinking water safety. These standards are very strict and are enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br>14) As mentioned above in response to point 13, all water we supply will meet strict safety standards.<br>15) The purpose of sea tankering is to reduce the amount of water we would need to take from the River Test during a severe drought, helping to protect this fragile ecosystem. Reducing abstraction from rivers is part of the Government's 25-year Environment Improvement Plan and you can read more about how we are trying to protect the River Test in our Drainage and Wastewater Management Plan (DWMP) for the Test and Itchen River Basin Catchment. However sea tankering from Norway also had associated environmental risks and this option is no longer included in our plan.<br>16) Our initial feasibility work on this option suggests that tankers of the required size will be able to dock at Southampton and we have engaged with the port to discuss the marine operations that would be co-ordinated by the port.<br>17) As part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/ . We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. Sea tankering from Norway is no longer included in our plan.<br>18) With regards to the chemical composition of water brought in by tanker, this option is no longer included in our plan.<br>19) Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We will deliver this option in a way that means there is no contamination of the environment or of drinking water. All water we supply will meet strict safety standards as monitored by the Drinking Water inspectorate (DWI). We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

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| | 22) Household bills will increase to help pay for the plant. The general public are already under immense financial strain to pay current bills.<br><br>23) Concern that agreeing to Southern Water proceeding with this humanitarily dangerous concept will then "open the gates" for all other UK water authorities to do this too.<br><br>24) Danger of the UK becoming too reliant on a very poor and damaging concept which will have serious long term affects to peoples lives.<br>25) Poses serious risks to Langstone Harbour and the Solent.<br><br>26) There are other options that Southern Water have not considered such as reservoirs and Aquifers for instance.<br><br>Please consider all my points fully. We are extremely fortunate to have our chalk rivers and streams/ponds in the area. I am led to believe we are the only place in the World which has this unique environmental legacy.<br><br>I would like to be kept informed of the outcome of this proposal and would strongly hope it will not proceed.<br><br>We need to find more environmentally and economic ways of collecting and storing our rainwater which should not include recycling effluent when we do not know the full impact in could have on future generations of human and all other living life. | 20) We would not expect newly laid pipes to have any significant leaks for many decades. Should these new pipes ever start to leak in the future we will fix them as quickly as possible. This is part of our company wide aim to reduce total leakage by 53% by 2050. This is a higher reduction than the 50% Government target for sector wide leakage reduction.<br>21) Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink.<br>22) We are fully aware of the impact of our planned future investments on customer bills. We offer support to our customers who face difficulty in paying their bills (Need help paying your bill? Find out how we can help.) and over the next five years we will be offering discounts of 45% or more to 182,000 homes.<br>23) With regards to your concern that this plan will 'open the gates' to other UK water authorities to conduct effluent recycling. Our Water Resources Management Plan, like other Water Companies, not only has to look at the water needs for the next 5 years but also needs to look ahead as far as 2075. This means gathering an understanding of the potential changes to the water supply need and impacts from climate change and population growth. Therefore, all water companies now need to consider water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. We are confident that our plan follows the National Framework, Water Resource Planning Guidance and other supplemental policies to not only secure a water supply but to also add to wider environmental and social benefits.<br>24) All water we supply will meet strict safety standards as monitored by the Drinking Water inspectorate (DWI).<br>25) With regards to your point 25, we a further consultation on water quality and environmental risks will be held in 2025.<br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br>26) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |
| WRMP900 | I am emailing to state three of the objections that I have to the Southern Water revised draft Water Resources Management Plan. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | a) Why should the planned reservoir for Havant need to have treated effluent pumped into it? The original permission was granted to Portsmouth Water for a reservoir to be built that contained spring water. Southern Water (SW) is unable to conform to current regulations regarding the drainage of sewage into rivers and lakes. What guarantee would there be that greater amounts of effluent would not be introduced , causing more harm to the recipients of the water and to the local bio diversity?<br><br>b) The proposal that eight tankers of Norwegian water should be shipped to Southampton continuously if extraction of water from the rivers Test and Itchen was unavailable to SW is laughable, if the matter wasn't so serious. In the winter months the UK has a surplus of water. Why should we need to import it?<br><br>c) Another proposal is to pump water from the Havant Thicket Reservoir to [redacted]; this would supply the Southampton and Winchester areas with drinking water via a 40Km pipeline whose construction would raise carbon levels significantly and destroy natural habitats, with an estimated annual running cost of £3 million.<br><br>Below are some alternative suggestions that should be considered:-<br><br>a ) Aquifers should be adapted to store surplus rain water to use in times of drought.<br><br>b) SW should begin a comprehensive programme of repairing water mains to stem the loss of 19% of the water that is currently lost.<br><br>c) If the [redacted] abstraction to the tidal limit could be moved, this would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. ( The SW Technical Report does not mention that this option has even been considered.)<br><br>There are many more objections that I have, but your time for reading will be limited. Please think of the consequences to our water supplies and the harm to future generations that could arise should this plan be approved. | a) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. The scheme will reduce our reliance on internationally protected rivers, theTest and the Itchen, during drought and provide a more reliable and sustainable source of water in the future. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>b) Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects. Water recycling inevitably uses more energy and as a consequence will be more expensive than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Alternative suggestions:<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | | the duration of abstraction and water quality. We will be exploring them further for our next plan. |
| WRMP901 | I am concerned about Southern Waters effluent recycling plant that has been proposed to be built at Budd's Farm, Havant in Hampshire. The plans are to feed the recycled water into Havant Thicket reservoir. There seems to have been a change of use of this reservoir. Initially Portsmouth Water were going to feed water from the chalk streams into the reservoir for storage for use in periods of drought, but Southern Water seem to have taken over this project for their use.<br>The plant has been agreed as a National Significant Infrastructure Project, but there are concerns about the cost of running the plant and its environmental impact.<br>To recycle the water it undergoes reverse osmosis, an energy heavy process that will cost £3m a year in energy usage. Because of the technology used, this has to be active for 24 hours, 365 days a year. The argument from Southern Water is that it will create a resilient and sustainable water supply for southern England. Southern Waters warning for not progressing with this plant is to transport water from Norway. Frankly an absurd solution, also the water from glacier run off is too acidic and will have an effect on the biodiversity in Hampshire. Southern Water argues that they will continue to abstract water from the chalk streams while waiting to get permission to build the recycling plant with resulting increase in pollution. Also a major environmental disruption is the 40 km pipeline that will have to be laid from Havant Thicket to [redacted] water processing plant.<br>The solution to this problem is solved if the abstraction is taken from the river Itchen at the tidal limit at [redacted]. Also managed Aquifers in delivering ground water require minimum infrastructure.<br>The documents relating to this effluent recycling project are restricted to the public and the appraisals of key environmental assessments are restricted as well | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and our Hampshire Water Transfer and Water Recycling Project (HWTWRP) will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>Portsmouth Water's planning permission for Havant Thicket Reservoir (already granted and with construction underway) is separate to HWTWRP, which is still at the pre-application stage of the Development Consent Order process. HWTWRP would be an addition to the already consented reservoir. Reservoirs are a crucial part of a resilient water supply network but are not always enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach to ensuring future water supply is to use water recycling to supplement the reservoir and ensure a ready supply of water that does not need to be taken from the environment.<br><br>Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reasons already outlined above, those conventional sources are no longer available to us. To address the potential environmental impacts, including increased energy usage, of HWTWRP, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk. The report details the preliminary findings of our environmental assessments based on the information available to date. The environmental assessments will continue to be updated and will be documented in an Environmental Statement that will be submitted as part of the Development Consent Order application.<br><br>Regarding the pipeline, impact from construction of the pipelines will be temporary and all land used for the construction of pipelines will be reinstated. The majority will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan. As above, the EIA process will identify and seek to either avoid, mitigate or compensate any environmental impacts arising from the construction of the pipeline. |

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| | | We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding documentation associated with HWTWRP, everything that has been finalised and/or made available for public consultation, is available on the project's dedicated website https://www.hampshirewtwrp.co.uk. Some documentation is not yet available as it is still being prepared ahead of the DCO application, which we anticipate will be submitted to the Secretary of State later in 2025. |
| WRMP902 | PLEASE UNDERSTAND THE URGENCY OF PROTECTING OUR WATER SUPPLY FOR YEARS TO COME.<br><br>WE HAVE SUFFERED ENOUGH WITH ALL THE EFFLUENT OVERSPILLS. THIS IS DAMAGING THE ENVIROMENT<br><br>Sadly they have just recycled the same old leaky plan, with more effluent recycling, but this time they are also proposing to tanker water all the way from Norway to Southampton in a drought to plug the gap in their plan to 2035!<br><br>I know it's unbelievable, even SW previously rejected tankering from Norway as a stupid idea (very expensive & environmentally unsound, with the risk of importing non-native species), but rather than look at more sustainable options that might undermine their case for recycling effluent that is their new plan.<br><br>In the UK we only collect 1% of rainfall. We need a better plan that works with climate change to collect more water in the predicted wetter winters and to store it for use in drier summers, using underground confined aquifers and by building new reservoirs. Instead, Southern Water propose energy & carbon hungry effluent recycling. The plant will be located on an old landfill site on the coast at Broadmarsh (Havant), with piling and tunnelling putting Langstone Harbour at risk from leachate. We need a radical rethink on where and how the company takes water from the environment, moving it's abstraction points closer to the sea to leave freshwater in our precious chalk streams for longer. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding sea tankering, this option is no longer included in our plan.<br><br>We acknowledge concerns raised about the need for the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment.<br><br>Regarding storage, our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and |

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| | It is shocking that SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious leakage and mains replacement programme they will never get leakage under control. | they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>We have also considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP903 | I strongly object to Southern Water's recycling plan which will interfere with our drinking water supply which currently comes from Portsmouth Water. Southern Water as a company has a terrible record of not adhering to the discharge rules, how can they be trusted to recycle properly? Why are they not focussing on dealing with the ridiculous amount of leakage they currently have? Why can't they collect more of our rainfall?<br>They should be made to perform their current responsibilities properly before going ahead and messing with our water supply from Portsmouth Water. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/. Regarding the safety and efficacy of water recycling, all water companies' provision of public supply is regulated by the Drinking Water Inspectorate, and further information can be found on their website; https://www.dwi.gov.uk/water-recycling/<br><br>Purified recycled water is water that has gone through a series of advanced treatment techniques before being pumped into a river, lake or reservoir – from where it can be taken |

| Reference | Feedback | Southern Water Response |
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| | | and treated to strict drinking water standards before being sent into supply. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP904 | Hi, I think the reservoir is a good idea but I'm against the sewage recycling as our water in the Portsmouth water area is great quality. Portsmouth water has said it will taste different and I don't want that to happen. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Your objection to the use of recycled water in Havant Thicket has been noted. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |

| Reference | Feedback | Southern Water Response |
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| | | All water companies' provision of public supply is regulated by the Drinking Water Inspectorate, and further information about water recycling can be found on their website; https://www.dwi.gov.uk/water-recycling/ |
| WRMP905 | I object to Southern Water's revised plan and demand a better more sustainable way forward by selecting options that work with climate change to store winter water . | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP906 | I was very upset to discover the unpublished news that Southern Water are planning a very environmentally unfriendly and expensive infrastructure plan to build an effluent recycling plant on an old landfill site at Broadmarsh, Havant. There is a big environmental impact of its construction and high risk of causing contamination into the harbour.<br><br>We have no guarantees that pumping this recycled effluent into the enclosed basin Havant Thicket reservoir will not contaminate this water supply too as water quality monitoring activities can be too late to prevent pollution incidents and look at the appalling pollution records of UK water companies.<br><br>This extra water supply can be achieved by much more environmentally friendly and cheaper alternatives:<br>Fixing leaky pipes (currently 19% of water abstracted is lost this way).<br>De-commissioning old Victorian bore holes from Upper Test and Itchen river locations and building new boreholes downstream with much lower ecological impact on the rivers.<br>Making Winter Aquifer storage available for summer droughts.<br>Further reservoir capacity if needed.<br>The whole idea of proposing to ship water from Norway as the only alternative is preposterous. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With reference to publicising the recycling plant proposals, the Hampshire Water Transfer and Water Recycling Project (HWTWRP) has a dedicated website and to date has hosted three separate consultations on this scheme, the first in 2022, the second in 2024 and the most recent in March 2025. Further information about these consultations, and the project documentation and updates, are available on the dedicated project website; https://www.hampshirewtwrp.co.uk/.<br><br>HWTWRP is just one of the water resource projects/options contained in our Water Resources Management Plan (WRMP). We consulted on our draft WRMP 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>With regard to the site chosen for the recycling plant, this site was selected from the feasible options identified as a result of its suitability and proximity to the source of water to be recycled. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction |

| Reference | Feedback | Southern Water Response |
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| | The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] is highly energy inefficient.<br><br>Please take this opportunity to protect our future wellbeing and stop the water companies from further damaging our environment and prosperity. | or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our DCO application, which we expect to submit later in 2025. The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. Regarding the operation of the site, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to nitrate reduction processes at Portsmouth Harbour WTW. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>A further consultation on water quality for HWTWRP was held in March 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Documentation in relation to this consultation can be found here; https://www.hampshirewtwrp.co.uk/consultation.html including the Environmental Water Quality Report.<br><br>Regarding leakage reduction, the target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

| Reference | Feedback | Southern Water Response |
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| | | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding sea tankering this option is no longer included in our plan.<br><br>Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reductions in the amount of water we can take from the Test and Itchen rivers, those conventional sources are no longer available to us. In addition, the length of pipeline adds to energy use, but is essential to move water around the network between existing treatment and supply infrastructure. To address the potential environmental impacts, including increased energy usage, of HWTWRP, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk. |
| WRMP907 | I am opposed to the above measure by Southern Water. This method does not resolve present leaks or improve sewage systems in relation to the volume of local house-building schemes, which impacts existing local residents.<br><br>This scheme would serve the island city of Portsmouth of which I am a resident. Southern Water already proposes to increase bills dramatically. It seems they are only interested in lining their own pockets, and those of Shareholders rather than the local environment encompassing both flora, fauna, and local residents.<br><br>The smell from [redacted] can be unbearable for days at a time, is this scheme likely to have the same impact? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as the Hampshire Water Transfer and Water Resources Project (HWTWRP). Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. Leakage reduction will help, but alone it cannot resolve the deficit. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. |

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| | The proposed scheme is on landfill. With proposed tunnelling and piling how safe will this be to flora, fauna and residents?<br><br>This Scheme is very worrying. What long-term effects are likely to be produced? If Southern Water pumps raw sewage into the sea periodically and can't, or won't, improve this, how effective will their proposals be? Surely they need to rectify the problems they already have before any further "planning" of new schemes takes place. | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>We note your comments regarding sewage systems and odour from the wastewater treatment works, however these are matters for our Drainage and Wastewater Management Plan (DWMP) and are not covered by the Water Resources Management Plan (WRMP). As this consultation is for our WRMP which relates to our plan for provision of drinking water we are unable to comment. For further information on sewage treatment please refer to our DWMP which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>On the specific point about odour from this wastewater treatment works we can confirm that the recycling scheme will not alter the volumes of wastewater that are treated at this location. As a result, there will be no impact on odour..<br><br>Regarding the location of the proposed recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment (EIA). Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP908 | We wish to OBJECT in the strongest possible terms to the Southern Water revised draft Water Resources Management Plan | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | We are residents of Rowlands Castle in East Hampshire and well into our eighth decade. Given the implementation timescales that have been mentioned, we do not expect to be here to see the results of this project were it to be given the go-ahead. However we are fundamentally opposed to Southern Water being allowed to take this project any further as a result of our concern over its effect on future generations not to mention the more immediate cost and impact on the environment.<br><br>Some of the reasons for our opposition to the proposal are:<br><br>1.<br>One of the main drivers for the project is to provide enough water to sustain the growth in population in the South of England. However we believe this population growth in the area is itself unsustainable since it is creating irreversible damage to the environment as well as intolerable pressure on all services, facilities and infrastructure including roads, health services, schools, power supplies as well as water supply and sewage disposal. The over-riding need is for public policy to recognise this growing problem and take appropriate steps to control it.<br><br>2. Southern Water has been fined tens of millions of pounds in recent years for causing unacceptabel levels of pollution in our rivers and along the coastline. They have shown that they are NOT TO BE TRUSTED to go ahead with a project of this type.<br><br>3. Whichever organisation is responsible for water supply and sewage disposal should be focussing primarily on:<br>Reducing water leaks - we understand that in the year 2022-23 alone over 100 million litres per day were lost.<br>Taking steps to more effectively capture and save the considerable rainfall that we do experience.<br>Tackling the sewage release problem. | We note the objection to the use of recycled water in Havant Thicket.<br><br>1. We note your concern (1) about the rate of population growth. However, unfortunately this is beyond the scope for this particular consultation: this consultation is focussed on the Water Resource Management Plan.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>2. We know our past pollutions performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. Our Business Turnaround Plan \| Southern Water.<br><br>3. With regards to your comment about reducing leakage: The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified by the Environment Agency as 'seriously water stressed' (see Water_stressed_areas__final_classification_2021.odt). Water stress is defined as areas where household demand is a high proportion of effective rainfall. It applies to both public water supplies and the natural environment, and takes account of the fact that public water supplies are under pressure from reductions in abstraction to make them more environmentally sustainable. There is also a need for public water supply to be more resilient to droughts and to meet additional demands associated with growth and development. The HWTWRP will address these demands by re-using water that |

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| | | has already been used for public supply, rather than taking more water from the environment during times of low flows.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>With regards to your sewage comment, this Water Resources Management Plan consultation is focussed on providing customers with clean potable water. For sewage concerns please see the DWMP (Drainage and Wastewater Management Plan) Our Drainage & Wastewater Management Plans (DWMPs). |
| WRMP909 | For more than 10 years as local resident, I have been actively involved in the consultation process involving the local community in the development leading to planning permission for Havant Thicket Reservoir. From that experience, I have been very supportive of the new reservoir for all the environmental benefits that it will deliver. That consultation was extremely detailed and thorough.<br><br>Notwithstanding all the serious concerns regarding the effluent recycling application, the "[redacted] Project" it was never tabled at any time during the reservoir consultation. It is now clear that because it was obviously going to be very controversial, it was "held back" until after planning for the reservoir had been approved. This is at best "mission creep" and more likely a cynical attempt to sidestep proper consultation and scrutiny.<br><br>As it is, SW loses some 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet SW's slow programme for improvements means even by 2050 SW will still be leaking about 10% of all the water it treats, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious leakage and mains replacement programme SW will never get leakage under control.<br><br>SW's selected best options is high energy, carbon and chemical hungry. SW needs to do more to repair leaks, replace mains, encourage demand reduction from households and non-household users and develop reservoirs and aquifer storage.<br><br>This is where future investment should be focused, not the [redacted] project.<br><br>I therefore most strongly oppose the [redacted] Effluent Recycling application. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. We are also aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government. The leakage target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, |

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| | | in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |
| WRMP910 | After attending a small locally organised talk on the new Havant Thicket reservoir, I was shocked to learn that Southern Water has sneaked in a draft plan for an effluent recycling plant. I am a customer of theirs and have always lived locally, yet this was the first I'd heard of their Water management plan. Few of us have the time, resources and even awareness to comment or object to their plans.<br><br>I totally object to any effluent recycling plant, these are for areas with no other water sources, and as a last resort. They are not for areas surrounded by water and with numerous other natural water sourcing options. The way the plan is drafted suggests that this effluent recycling plant is one of only two options for the future, the other being tankering in water from Norway, which is an absurd and misleading suggestion. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent. We consulted on our draft WRMP 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Regarding the project itself, HWTWRP is classified by the Planning Inspectorate as a Nationally Significant Infrastructure Project (NSIP), and as such, we are required to seek consent from the Secretary of State in the form of a Development Consent Order (DCO). We |

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| | The location of the proposed plant is very concerning, the area used to be a land fill site and would need to be piled to be built upon, which would create a massive risk of leaching contaminated waste into the Harbour and surrounding areas. Also the idea of 'topping up' the new, raw water sourced reservoir, with recycle effluent is a major concern, based on Southern waters track record, only recently they contaminated the water supply in Winchester and West Sussex, and of course all of their illegal river and sea discharges and their leaky network too. It's not worth the environmental and reservoir water supply risk. Southern Water are now run by the same people who ruined Thames water, financially and otherwise.<br><br>The plan should be firstly focusing on repairing the current leaky network, with more ambitious reductions, faster. All their 'parked' alternatives need to be favoured, all aquifer storage schemes should be established, total relocation to abstraction points at the the river tidal limits should be made, more raw water reservoirs and desalination should be used as a last resort. I realise desalination is energy heavy, however it's still 50% less energy hungry than a effluent recycling plant would be, pumping a new 40km uphill network.<br><br>Based on the predicted costs and time scales I was confused as to why Southen water have prioritised this water sourcing over the others, again I was shocked to learn that they can make huge profits out of this type of 'investment'. Labour did promise to stop water companies operating in this way, so by rejecting these plans it will send a clear message and precedent to prove the Government keeps its promises. | expect to submit a DCO application to the Planning Inspectorate in 2025. The DCO process puts an emphasis on consultation and early engagement with stakeholders and communities. In this regard, we have carried out three separate consultations on this scheme, the first in 2022, the second in 2024 and the most recent in April 2025. In terms of local engagement for our consultations, in 2022 we ran a six-week non-statutory consultation (eight weeks in 2024), sending out almost 30,000 letters to those in the primary consultation zone around the Project. We placed half-page colour adverts over three weeks in the Southern Daily Echo, Hampshire Chronicle and The News (Portsmouth), and ran a social media outreach programme that ran throughout the six weeks of the Consultation. We sent posters to parish councils, and other social hubs like churches, community centres and libraries. We also launched a dedicated website which hosted a virtual room. The virtual room afforded the public with the opportunity to view consultation materials without needing to attend an in-person event. We hosted six in person events in proximity to the pipeline corridors and three online sessions across three consecutive weeks at different times to accommodate for different groups. Reference copies of the consultation materials were also located at 9 different deposit points including libraries and community hubs. We made sure to accommodate those who did and did not have access to either the internet or appropriate viewing technology. Further information about these consultations, and the project documentation and updates, are available on the dedicated project website; https://www.hampshirewtwrp.co.uk/<br><br>We note your comment regarding water supply contamination.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for.<br><br>In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>With regard to the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We |

| Reference | Feedback | Southern Water Response |
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| | | have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as aquifer storage. As outlined above, reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These additional options will help, but cannot resolve the deficit alone. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish, such as salmon. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Our plan includes a number of desalination plants in our Eastern area. We submitted our detailed assessment of the desalination option on the Southampton coast to RAPID in 2021. We had recommended removal of the option primarily due to the potential environment impacts. RAPID agreed with our assessment. The assessment of our submission by RAPID is available on Ofwat's website https://www.ofwat.gov.uk/wp-content/uploads/2022/03/Strategic-regional-water-resource-solutions-accelerated-gate-two-final-decision-for-Desalination.pdf |

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| | | Regarding profits, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP911 | I write with reference to Southern Water's Draft Water Resources Management Plan which is now available for public comment, prior to its review by DEFRA after 4th December 2024.<br><br>From the local press, social media and conversations with friends, I understand that there is considerable local opposition to Southern water's proposed use of the Havant Thicket Reservoir, given that Portsmouth Water's customers would also receive the mixed water, despite the current Local Planning Authority approval being for construction and operation of a reservoir filled with 'raw water' sourced from the company's local chalk-fed freshwater springs.<br><br>Having looked at the considerable date available to the public I am very concerned by Southern Water's commitment to the use of recycled sewage effluent. Indeed, the web-site havantmatters.org lists 40 concerns that should be explored by DEFRA's review of this latest WRMP.<br><br>Personally I was shocked to read that SW loses 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Therefore, without a more ambitious mains replacement programme now and in the very near future they will never get leakage under control!<br><br>Of great concern also is that the plan does not strive to work with the predictions regarding climate change and doesn't seek to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers<br><br>Given the points made above I write, therefore, to ask that, as my Member of Parliament, you use all measures at your disposal to ensure that DEFRA takes full cognisance of the '40 concerns' in its forthcoming review.<br><br>Thank you in advance for your support in this matter. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We acknowledge concerns raised about the need for the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as aquifer storage. As outlined above, reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These additional options will contribute, but cannot resolve the deficit alone. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding additional storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs; the Havant |

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| | | Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan. |
| WRMP912 | As part of the consultation process we are writing to object, in the strongest possible terms, to Southern Water's proposal to use allegedly treated sewage waste water as a means of supplementing the water supply to the new Havant Thicket reservoir. As an initial point it is worth noting that Southern Water have singularly failed to raise public awareness of their proposal, no doubt concerned at the negative reaction such a plan would undoubtedly raise. Our concerns, and those of many other residents served directly or indirectly by Southern Water, are on many levels and whilst we are not in anyway technically minded and do not propose to argue the scientific feasibility of the Reverse Osmosis process, for ordinary residents like us it is simply wrong and potentially a disaster waiting to happen.<br>We would expect that DEFRA would take account of the following points:<br>Despite the fact that the water quality from the sewage treatment plant at [redacted] is already expected to deteriorate over time, as admitted by Southern Water, this water authority has no plans to improve the situation. How can they then think it is viable to pump "treated sewage water" in to the new Havant Thicket reservoir when it is known by all sides that not all contaminants can be removed?<br>Southern Water are proposing that they alone should effectively be judge and jury on the monitoring and control of any water pumped from [redacted] to the reservoir. Southern Water, as with all water companies, have a history of human, technical and system failures in their management of our most basic human need - water.<br>Any contamination from the allegedly treated water, and it will happen sooner or later, will be a disaster for the Havant Thicket reservoir as it cannot be reversed or washed away. This will render it completely unusable for it's intended use of supplementing the future water supply for human use.<br>The environmental impact of the new proposed Effluent Recycling Plant (ERP), associated pipework and pumping stations to Havant Thicket and even further afield to [redacted] appear to be of little or no concern to Southern Water when alternative sites for an ERP have been identified but dismissed. Even if an ERP was considered the viable option for the future, a fact which we do not accept, Southern Water's own Preliminary Environmental Information Report states that by locating it at the coast there will be a significant impact from the discharge from the new plant into the Solent via the long-sea outfall.<br>WE can only conclude that Southern Water's primary driver for advocating such a costly, disruptive and dubious scheme is because they are permitted to make profits from such capital expenditure. They have no intention in addressing the issue of a future failing water supply by reducing leaks from their current pipes and infrastructure or indeed implementing much cheaper | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent. We consulted on our draft WRMP 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Regarding the project itself, HWTWRP is classified by the Planning Inspectorate as a Nationally Significant Infrastructure Project (NSIP), and as such, we are required to seek consent from the Secretary of State in the form of a Development Consent Order (DCO). We expect to submit a DCO application to the Planning Inspectorate in 2025. The DCO process puts an emphasis on consultation and early engagement with stakeholders and communities. In this regard, we have carried out three separate consultations on this scheme, the first in 2022, the second in 2024 and the most recent in April 2025. In terms of local engagement for our consultations, in 2022 we ran a six-week non-statutory consultation (eight weeks in 2024), sending out almost 30,000 letters to those in the primary consultation zone around the Project. We placed half-page colour adverts over three weeks in the Southern Daily Echo, Hampshire Chronicle and The News (Portsmouth), and ran a social media outreach programme that ran throughout the six weeks of the Consultation. We sent posters to parish councils, and other social hubs like churches, community centres and libraries. We also launched a dedicated website which hosted a virtual room. The virtual room afforded the public with the opportunity to view consultation materials without needing to attend an in-person event. We hosted six in person events in proximity to the pipeline corridors and three online sessions across three consecutive weeks at different times to accommodate for different groups. Reference copies of the consultation materials were also located at 9 different deposit points including libraries and community hubs. We made sure to accommodate those who did and did not have access to either the internet or appropriate viewing technology. Further information about these consultations, and the project documentation and updates, are available on the dedicated project website; https://www.hampshirewtwrp.co.uk/ |

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| | storage options such as aquifers or traditional reservoirs as this does not suit their financial bottom line for directors and shareholders.<br>Finally the biggest issue about the whole proposal is a singular failure to recognise the general public perception of its suitability. Southern Water is there to provide a service to their customers and people simply do not want to be asked to drink or use water which has come from a sewage recycling plant. This will lead to a blight on the future housing market when many prospective buyers will be reluctant to move with their families to a large part of Southern England where the tap water emanated from such a dubious source.<br>There are many more arguments which could be made on technical, financial and environmental grounds and no doubt will have been raised by people more able than ourselves. As ordinary residents and customers we can only state in the strongest possible terms that this proposal is wrong for ourselves, our families and future generations. | We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Regarding the quality of recycled water, the advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. In addition, it is the role of the Drinking Water Inspectorate (DWI) to check that water companies in England and Wales supply safe drinking water that is acceptable to consumers and meets the standards set down in law. This includes independently checking the water quality tests carried out by water companies and auditing water company laboratories.<br><br>A further consultation on water quality for HWTWRP was held in March 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Documentation in relation to this consultation can be found here; https://www.hampshirewtwrp.co.uk/consultation.html including the Environmental Water Quality Report.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in |

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| | | Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2. With regard to the site chosen for the recycling plant, this site was selected from the feasible options identified as a result of its suitability and proximity to the source of water to be recycled.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as aquifer storage. As outlined above, reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These additional options will help, but cannot resolve the deficit alone. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>Regarding profits, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum |

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| | | profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>. |
| WRMP913 | Please direct your attention to the concerns (of all residents) in the Hampshire area. Sending treated water into the fresh water reservoir is not acceptable, no resident wants to pay for this water (!) and the fact that the public complaints through the planning process can be discarded is outrageous.<br><br>Would you want to drink from that tap? Southern Water is throwing raw sewerage into the sea on almost a daily basis because "they can". Trusting them to get this right? Not until they sort the sewage mess out first. Then prove how safe this process will be, with evidential testing made public, for the public decision.<br><br>I am not happy to drink from such a tap. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The water at customers' taps will continue to meet strict drinking water quality standards. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. Further information on water recycling safety and standards is available on the DWI website https://www.dwi.gov.uk/water-recycling/ |
| WRMP914 | I am writing to you as a resident of Rowlands Castle with concerns on the plans in the revised draft of the recycling proposal of effluent.<br><br>Very little information has been circulated by southern Water to help me understand the plans for effluent recycling. I understand that the Local Planning Authority agreed on the construction of the Havant Thicket Reservoir was conditional on raw water being sourced from chalk fed freshwater springs.<br><br>Reverse Osmosis has not been used before in the UK and there needs to be independent monitoring of the discharge into the reservoir.<br><br>Apart from the huge costs involved, there is a lack of trust in the quality of the water from our taps for drinking water. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report, and there is a dedicated website containing detailed information on the Hampshire Water Transfer and Water Recycling Project (HWTWRP), where you can subscribe to updates; https://www.hampshirewtwrp.co.uk/<br><br>Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. Regarding the operation of the site, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to nitrate reduction processes at Portsmouth Harbour WTW. |

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| | The impact on the harbour wildlife and recreation is of concern and the idea that we can tank water from Norway in a drought seems incredible and at a huge cost<br><br>I am asking DEFRA to reject this plan and use this opportunity to ensure that the environment is put before profit and give time to develop sustainable solutions. | All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of the reservoir. A further consultation on water quality was held in March 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The Environmental Water Quality Report in summary, shows that changes in water quality in Langstone Harbour would be small and are not expected to have any impact on biodiversity. The report also confirms that reject water from the water recycling process, which will be released into the Solent, is unlikely to affect water quality or the biodiversity of the Solent. The full report is available to download here https://www.hampshirewtwrp.co.uk/EnvironmentalWaterQualityReport.pdf<br><br>Sea tankering from Norway is no longer included in our plan. |
| WRMP915 | I am deeply concerned about Southern Water's WRMP and in particular about Southern Water's proposal to recycle effluent water from [redacted] WWTW to the Havant Thicket Reservoir.<br><br>There are many cheaper and better measure that SW need to focus on urgently now, instead of pushing these into the future I feel they have not produced a sound robust plan for our water provision.<br><br>1. Leakage. Southern Water (SW)are not planning to do enough to replace water mains and reduce leakage. This is a terrible waste of treated water just running into the ground. Their suggested programme on mains renewal is far too slow.<br><br>2. Demand reduction. SW are not planning to do enough on water efficency to reduce demand. This is an inexpensive solution and should be high priority.<br><br>3. More sustainable alternatives. SW have not looked enough at greener are sustainable ways of water capture and storage.We have plenty of rainfall and are not a dry artid place. Currently in regions where effluent recycling is use, such as Singapore, Australia and Calafornia rain is scarce. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>**1) Leakage**<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is |

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| | 4. Poor poulation data. The population figures are inflated. Many Local Plans on which data is basd were prepared many years ago and are out of date.<br><br>5. TRUST. Consumers do not TRUST Southern Water. The company have have an appalling track record of polluting our rivers and harbours and have not been honest and open. They also have a terrible reputation regarding customer care at times of outages.Residets are furious.<br><br>6. Hampshire Water Transfer and Water Recycling Project is not a sustainable solution and should be rejected. Reasons listed below:<br><br>A. Poor public engagement. No public consultation at the FORMATIVE stage when the desalination proposal at [redacted] was dropped and recycling effluent from [redacted] became the favoured proposal.<br>There was little attention paid to speaking face to face with residents particularly in the four Leigh Park Wards nearest to the reservoir site. (all have a high indecies of deprivation) These are more difficult to reach and more work should have been done to engage with them. Water bills would have been a good way of dissemination information but was not used.<br>A lot of information was restricted and difficult to access.<br><br>The 2024 consultation I believe to be FLAWED as it was not carried out at FORMATIVE (Gunner principals)stage. The company's Statement of Community Consultation 2024 sets out the process. At the same times as the Consultation was running SW associate Portsmouth Water had registered a planning application for a dual pipeline to the reservoir. This would only be needed for effluent recycling.<br>This is evidence that the 2024 consultation was not held at a FORMATIVE stage. It was held at an advanced stage when the type of dual pipeline which would only be required for water recycling was already designed, registered by the Local Planning Authority and out for public comment.<br>The spring fed reservoir only requires ONE pipeline and that already has planning consent.<br><br>B. The proposal to build the Water Treatment Works to treat the effluent water from [redacted] WWTW at Brockhampton West in Bedhamoton is SHOCKING. This is a toxic former landfill site on the coast which already pollutes Langstone Harbour. Constructing the treatment works on this site is probably the worst place in the whole Borough. Pipes will have to run down through the landfill and also under the Hermitage Stream nearby. There is already big probles with coastal erosion. All this would be commissioned by SW. This is the same company who have polluted the harbour for years on end pretty much unchecked and finally were fined £90 million for polluton event and described as criminal by the Judge in his summing up.<br><br>C. The effluent recycling project would have a vast carbon footprint. Huge amounts of concrete and other materials and HGV movements would take place during construction.<br><br>D. Intensive energy use, particularly to pump water around the areas. Only a fraction of this energy could be sustainably generated locally. | too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>**2) Demand reduction**<br><br>We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier. Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>**3) More sustainable alternatives**<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>With regards to consideration of capture and storage options, A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Reservoirs are another storage option: they require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>**4) Population data** |

| Reference | Feedback | Southern Water Response |
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| | E. Damage to the environment. No environmental net gain. The original spring fed reservoir would have helped reduce nitrates in Langstone Harbour. The spring water has a high nitrate level and currently flows into the Langstone Harbour. Pumping the spring water to Havant Thicket Reservoir would have brought about the benefit of nitrate reduction. There will be a disbenefit if the effluent recycling was agreed as less spring water would go the reservoir.<br><br>F. In those countries where effluent recycling is used very little flows to domestic taps. For example in Singapore 55 per cent of water is recycled water(newwater) but only 5 percent flows taps. Most people on the island drink bottled water. The water is used in agricultural and industry. They have the highest percentage consumption of bottled warer in the world.<br><br>G.Currently the majority of people in England drink tap warer. It's unknown what percentage would turn to bottled water.SW have no produced any data on this. Increased use of bottled has an environmental impact but SW have not assessed that either. | For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br>Our capital programmes are delivered in line with our regulatory commitments and operational needs. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>**5) Public trust**<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br>Our Business Turnaround Plan \| Southern Water<br><br>**6) Hampshire Water Transfer and Water Recycling Project**<br>**A. Public engagement**<br>We have fulfilled all regulatory and legal requirements regarding the public consultation, , but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. |

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| | | With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers, contacted MPs, stakeholders and previous responders directly, and publicised the consultation in our newsletter which went out to all of our customers.<br><br>Thank you for raising your concerns about whether the rdWRMP24 consultation aligns with the Gunning Principles in being truly formative. The purpose of this consultation has been to gather stakeholder input and that we expect changes to be made to the rdWRMP24. Whilst we appreciate the concerns, as a final decision on the rdWRMP24 had not been made or predetermined at the time of the consultation, we do not agree that it is contrary to the Gunning Principles.<br><br>**B. Former Landfill site**<br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |

| Reference | Feedback | Southern Water Response |
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| | | **C. Carbon footprint**<br>See (3) above.<br><br>**D. Intensive energy use**<br>See (3) above.<br><br>**E. Environmental impacts**<br>See (3) above. The scheme will reduce abstraction pressure on the environment and the resulting impacts.<br><br>**F. In those countries where effluent recycling is used very little flows to domestic taps**<br>No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>**G. Currently the majority of people in England drink tap water**<br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. No untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir. |
| WRMP916 | I am writing to you as a Southern Water customer. I live in Horndean very near to the new reservoir so myself and my family will be impacted by future decisions concerning the Effluent Recycling Scheme.<br><br>I have major concerns about the environmental impact, the cost and trust in the water company as their track record has been very poor.<br><br>My main concerns are that other options have not been explored thoroughly. I believe that rain water storage using aquifers and more reservoirs could be a cheaper more sustainable option with less environmental impact. If the 19 % of water wasted due to leaks could be improved this would save water. This would be a far more sustainable option than tankering water from Norway.<br><br>Digging 40 km of pipework to transfer the recycled effluent will have a huge environmental impact and running costs in the region of £3 million each year (which the customers will have to pay). The energy needed, not just in times of drought, will be unacceptable. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. We consider cost and environmental impact alongside other factors such as volume of water that an option can provide, its resilience to climate change etc. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>We know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan: Our Business Turnaround Plan \| Southern Water<br><br>With regards to your suggestion of other storage and rainfall capture options: A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South |

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| | The shafts which will need to be dug into Broadmarsh landfill could cause contaminated pollution to leak into Langstone Harbour. The water which will be discharged into the Solent will also affect the water quality and therefore our marine mammals. The plan shows no independent monitoring of the discharge from the recycling plant and I and many others don't feel S.W. can be trusted.<br><br>Finally the environmental impact of increase in plastic bottles used for bottled water by people who want to be confident that the water they are drinking is safe will increase.<br><br>I feel that customers have not been given enough information on these plans nor have people been given enough time for consultation on these plans. | Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A further consultation on water quality for HWTWTP will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding your concern about the laying of pipework: The majority of the pipelines will be installed using trenches across farmland. In other locations, such as populated areas or where there are particularly sensitive environmental constraints, trenchless techniques will be used. Installation of the pipelines would be controlled by various management plans, including a Construction Environmental Management Plan. Water recycling inevitably uses more energy and is subsequently more expensive to run, than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

| Reference | Feedback | Southern Water Response |
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| | | Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>With regards to your comment about our consultation, we have fulfilled all regulatory requirements in this respect. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1,176 responses as part of rdWRMP24 consultation. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>Sea tankering from Norway is no longer included in our plan. |
| WRMP917 | I strongly object to Southern Water's application for refuse recycling at the Havant reservoir due to the environmental and economic flaws in their revised plan. Southern Water continues to promote expensive, energy-intensive effluent recycling while dismissing more sustainable alternatives. Their plan includes tankering water from Norway—a previously rejected, environmentally unsound idea that risks introducing non-native species and comes with significant costs. Instead, SW should prioritise solutions that align with climate change adaptation, such as collecting and storing more winter rainfall in reservoirs and aquifers.<br><br>My main points of objection are as follows:<br>Southern Water has a history of poor water management. It loses 100 million liters daily to leaks, wasting 19% of their treated water. Even by 2050, they aim to reduce leakage by only 53%—far less ambitious than the achievable 70% reduction experts suggest. They should be held to account and spending money on a solution to this waste.<br><br>Locating the recycling plant on a landfill site near Langstone Harbour threatens contamination through leachate. The high-energy recycling process will pump treated water over long distances, further increasing carbon emissions.<br><br>Southern Water's refusal to invest in network connectivity and reservoirs undermines long-term resilience. Instead, their plan prioritises profit-driven recycling schemes that burden customers and the environment. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Water Resource Planning Guideline requires WRMP24 to be a Best Value Plan i.e. a plan that aims to deliver wider benefits to society and the environment, by taking account of a wide range of factors, alongside economic cost, in identifying the preferred water resource programme.<br><br>Regarding sea tankering, this option is no longer included in our plan.<br><br>With regards to your suggestion of other storage and rainfall capture options: A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a |

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| | I urge DEFRA to reject Southern Water's flawed plan and demand a sustainable approach that focuses on reducing leaks, improving demand management, and developing infrastructure to store winter water for summer use. This approach would better protect our environment and ensure long-term water security. | number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan: Our Business Turnaround Plan \| Southern Water<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Ofwat regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP918 | I am writing to express my strong objection to Southern Water’s (SW) revised draft Water Resources Management Plan 2024. This is a once-in-a-generation opportunity to prioritize sustainable and environmentally sound solutions to address water scarcity, yet SW’s current proposals fall woefully short of this imperative.<br><br>Key Concerns with the Revised Plan<br>Effluent Recycling Schemes:<br><br>Southern Water’s persistent push for energy- and chemical-intensive effluent recycling as a key strategy is deeply concerning. Placing the recycling plant on a former landfill site at Broadmarsh (Havant) risks contaminating Langstone Harbour due to piling and tunneling operations.<br>The plan involves pumping treated effluent 40 kilometers to [redacted] at an astronomical and escalating cost of £1.2 billion, while failing to adequately explore sustainable alternatives such as improved rainfall collection and aquifer storage. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Water Resource Planning Guideline requires WRMP24 to be a Best Value Plan i.e. a plan that aims to deliver wider benefits to society and the environment, by taking account of a wide range of factors, alongside economic cost, in identifying the preferred water resource programme.<br><br>Regarding you concerns about the environmental impacts, such as the risk from invasive non-native species (INNS) of the sea tankering from Norway option we confirm that this option is no longer included in our plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement |

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| | Water Tankering from Norway:<br><br>The proposal to tanker water from Norway during droughts is environmentally and economically unsound. It risks introducing non-native species, contradicts Southern Water's earlier assessment of this option as unviable, and represents a clear disregard for sustainable water management practices.<br>Failure to Address Leakage:<br><br>Southern Water's inefficiency in addressing leakage is alarming. Losing 100 million liters of water daily (19% of all water abstracted) is unacceptable, particularly when customers pay for this waste.<br>The plan's modest target of reducing leakage by only 53% by 2050 is insufficient. Expert analysis suggests a more ambitious target of a 70% reduction is achievable with proper investment and prioritization.<br>Lack of Network Integration:<br><br>In West Sussex, Southern Water has failed to connect its water network, resulting in unnecessary dismissal of viable options simply because water cannot be transported to areas in need. This shortsightedness prioritizes effluent recycling schemes over developing an integrated and robust water network.<br>Missed Opportunity for Sustainable Solutions:<br><br>The UK collects only 1% of rainfall. Instead of relying on unsustainable, high-carbon methods, Southern Water should prioritize solutions that align with climate adaptation:<br>Building new reservoirs to store excess winter rainfall for use in drier summers.<br>Moving abstraction points closer to the sea to preserve freshwater in chalk streams.<br>Maximizing aquifer storage capacity to work with, rather than against, natural hydrological cycles.<br>Why DEFRA Must Reject this Plan<br>If this plan is approved, Southern Water will gain de facto approval to pursue unsustainable and high-cost effluent recycling schemes, at great expense to the environment and its customers.<br>The potential amalgamation of Portsmouth Water with Southern Water further raises concerns about cost-sharing, potentially burdening Portsmouth Water customers with inflated bills.<br><br>The revised draft plan demonstrates a clear prioritization of corporate profit over the environment, public interest, and long-term sustainability. This is unacceptable and must not be allowed to proceed.<br><br>Call to Action<br>I urge DEFRA to reject Southern Water's revised draft Water Resources Management Plan and require the development of a truly sustainable, forward-thinking strategy. Specifically, DEFRA should mandate:<br><br>A significant reduction in water leakage with a minimum target of 70% by 2050. | programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>With regards to your suggestion of other storage and rainfall capture options: A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | Investment in sustainable water storage solutions, such as reservoirs and aquifer storage, to manage the predicted seasonal variability in rainfall.<br>Comprehensive network integration to enable equitable water distribution across Southern Water's service area.<br>This is a critical moment to ensure water resource management aligns with climate resilience and environmental stewardship. Southern Water must be held accountable to deliver a plan that prioritizes these principles.<br><br>Thank you for considering my objections. I trust DEFRA will take the necessary steps to ensure Southern Water develops a sustainable and responsible water management strategy that benefits both the environment and its customers.<br><br>When I was at school many years ago I was taught that there was a vast untapped resource of an artesian basin that stretched for thousands of square miles under Hampshire, the Channel, Dorset Devon etc. Has this resource been fully utilised?Are | |
| WRMP919 | I am writing to object to Southern Waters Draft plan which is appalling.<br><br>Tinkering in water from Norway is a crazy in efficient and unethical idea.<br><br>The water shortages are as a result of leaky pipes with 19% of water we pay to treat lost! SW should be reinvesting those huge profits into repairing the existing pipe network, not charging us more to make more profit, or claim they need to make repairs.<br><br>You need to ensure these water companies are held accountable! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Water Resource Planning Guideline requires WRMP24 to be a Best Value Plan i.e. a plan that aims to deliver wider benefits to society and the environment, by taking account of a wide range of factors, alongside economic cost, in identifying the preferred water resource programme.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal. |
| WRMP920 | I find the latest Water Resources Management Plan from Southern Water deeply disturbing: | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | a) because the primary aim still appears to be maximising profit for shareholders - regardless of the cost to bill payers and the environment;<br>b) if permitted, I believe that the latest proposed effluent recycling and transfer scheme could set a bad precedent - driving further similarly bad proposals across the country.<br><br>I therefore strongly urge DEFRA to REJECT Southern Water's proposed plan.<br>It appears to be based on poor assumptions regarding future needs.<br>It is unnecessarily expensive (the latest construction estimate is £1.2 to £1.4 BILLION, and spiralling).<br>It is unnecessarily inefficient (the latest energy estimate just to treat & pump the water will cost at least £3 million per year).<br>It is carbon intensive and therefore unsustainable.<br>It is a high risk to the environment and local people.<br>It will not benefit local people.<br>It is not expected to be in operation before 2035 and therefore won't help to satisfy existing or short-term needs.<br>Once opened it has a useful life of only 60 years - so no legacy benefit.<br>Southern Water have so far ignored or mysteriously rejected much simpler, efficient, cheaper, tried and tested solutions.<br><br>In addition to rejecting the latest proposal, I believe DEFRA should also somehow force - or at least incentivise - Southern Water to:<br>stop wasting time and bill payer's money with so many poor proposals;<br>properly explore and develop sustainable solutions which exploit our wetter winters by storing excess water in existing confined aquifers;<br>build more winter storage reservoirs (apparently they could build 3 for the same estimated costs of this proposal!);<br>move river abstractions to the tidal limit to reduce risks and improve the ecology of rivers;<br>extract from springs along the coast;<br>speed up mains maintenance and renewal programmes in order to reduce waste;<br>consider purchasing under-utilised private supply licences.<br><br>Time is of the essence. Climate change is happening NOW! The UK is classified as one of the world's most nature-depleted countries! Damaged ecosystems exacerbate climate change, undermine food security, and put communities at risk. Further climate mitigation delays by companies such as Southern Water could be catastrophic. We simply cannot afford to let Southern Water continue wasting time and money developing inappropriate schemes such as this. It is more important than ever before for authorities like DEFRA to listen to and act in the best interests of the public by helping to improve transparency (and trust), and also taking measures to minimise the misinformation, disinformation, corruption and delays of the corporate elite - who are currently destroying our environment and people lives. | Regarding cost and profit, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017.<br><br>We acknowledge concerns raised about the need for the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reductions in the amount of water we can take from the Test and Itchen rivers, we need to find sustainable alternatives. In addition, the length of pipeline adds to energy use, but is essential to move water around the network between existing treatment and supply infrastructure. To address the potential environmental impacts, including increased energy usage, of HWTWRP, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the |

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| | | greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The company Water Resource Zones do not always extend to the coast as might be expected (e.g. especially in Hampshire), as the resource zones are distinct and separate from the physical infrastructure of the Water Supply Zones. Additionally, many coastal springs are often relatively small from a public supply perspective, and such spring discharges typically show a strong seasonality and decline significantly in summer periods. Or abstractions at these locations can be more prone to saline intrusion. So coastal springs general tend to offer poorer drought resilience and security of supply. Similarly, associated coastal wetland environments dependant on such smaller springs will also be drought sensitive. However, such options (or those available within our water resource zones) will continue to be reviewed and reconsidered in future water plans.<br><br>Regarding the use of under-utilised private supplies, this is an option we are reviewing as part of the next Water Resources Management Plan. |
| WRMP921 | I wish to state my objections to Southern Water's revised plan.<br>My principal grounds for objection are that the plan is unnecessary and exorbitantly costly. Also, it poses serious risks of environmental damage; there is also a range of safety problems which potentially jeopardise people's health. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource |

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| | The plan to 'recycle effluent' to top up the reservoir is unnecessary because there are alternatives which would be less costly, less potentially hazardous and quicker to implement. Each of these alternatives would contribute to solving the problem that Southern Water seeks to address, i.e. maintenance of a reliable supply of water without detriment to the fragile ecology of the Test-Itchen chalk streams. Thus, a concerted programme of investment to reduce leaks in the supply network would help. Relocating the plant which currently extracts water from the chalk streams would minimise the problem of damaging the streams' freshwater ecology; for example, by relocating downstream to a point just above the tidal reach. Currently there is inadequate collection of rainwater, only a trivial percentage of which is collected for storage.<br>The building and development of the infrastructure to realise Southern Water's plan (including three new pumping stations, more than 40 miles of pipeline, and the development of new plant to process the effluent) would be ludicrously expensive: current estimates are £1.3 billion, with costs said to be rising all the time ! Unspecified amounts of this vast sum would presumably have to be borrowed: yet Southern Water's financial status has just been downgraded, which will result in higher costs of borrowing. This will become an increasing burden on the customers.<br>In addition, this development of the infrastructure would be 'carbon heavy', compromising the commitment of Southern Water to reduce its carbon emissions by 2030.<br>I am deeply concerned about a range of environmental risks associated with the whole project: the Broadmarsh site (designated location of the 'treatment' plant) has historically been a 'dump' for industrial waste, contaminants from which could leak into the water; the ground is likely to be unstable, as it has been the site of a landfill tip: this potential instability could compromise the integrity of the infrastructure. As far as I am aware, there has been no application of the planned processes on this scale in this country before, which raises questions about its safety. If contaminated water accidentally reaches the reservoir, the water stored there would be irreversibly polluted, with grave risks to public health and to the natural environment.<br>Finally, I have no confidence that Southern Water would (a) maintain the level of investment required to keep the systems running safely and (b) report truthfully on any 'issues' that might arise. Just look at how they behave now, illegally dumping raw sewage and covering up their misdeeds !<br>Please reject their proposals. | projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as HWTWRP. Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. Leakage reduction will help, but alone it cannot resolve the deficit. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>Concerning the carbon impact of large infrastructure schemes, as WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government’s legislative target to reach Net Zero by 2050. |

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| | | The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>With regard to the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by HWTWRP. We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP922 | Fundamentally Southern Water's plan must be rejected. On so many counts it is wholly unacceptable.<br><br>I share with you a number of reasons for rejecting this plan. To be frank there are many reasons and I know you will receive many letters and emails exposing Southern Water's plan as being wholly unacceptable.<br><br>1 -Southern Water's plan commits us to paying for recycled effluent as the primary source of our drinking water every day of the year, year on year. Aside of the many reasons I shall draw to your attention later we shall all be committed to paying vast sums for a service that extracts water from effluent which includes raw sewage and water run-off into the recycling plant. There is no alternative or second option on offer.<br><br>2-There is no plan to abstract water from lower down the catchment area, there is no plan to capture fresh rainwater. Climate change predictions show that we are likely to encounter wetter winters. Quantity of rainfall predictions indicates sufficient rainfall to supply all our water needs if it were collected. No such plan exists to create more reservoir catchments.<br><br>3 – The Candover Drought Option should not be permitted to continue beyond 2030. The [redacted] river abstraction should be moved to nearer the tidal zone. Climate predictions indicate drier summers. Our rivers need a flow to sustain biodiversity and protect wildlife.<br><br>4 – it is incredulous that Southern Water would tanker in water from Norway should we have a drought. This shows a complete disregard, or perhaps deliberate intent, not to make use of our | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>1. Following reductions in the amount of water we can take from Rivers Test and Itchen and their associated aquifers, we need to find at least 166 million litres of water a day to supply customers in Hampshire, that isn't from a river or aquifer. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding sustainable water supplies into the future means we need to look at all viable alternatives to the sources that have been traditionally used. HWTWRP is being funded in the same way as all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across water supply customers' bills across our region. As with all costs and charges to customers, funding for the Project will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year. The Project is continuing to be developed. We currently estimate that the cost of the Project to each of our water supply customers would be approximately £2.50 a month over a 20-year period.<br><br>2. We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered |

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| | own rainfall. Water inevitably contains organisms. Mixing water from one country with our own, opens up the possibility of bringing in unwanted 'guests' which could devastate our own wildlife. Further altering the pH of our water could have deleterious effects on our own wildlife.<br><br>5 – Southern Water manipulate population figures and thus inflate water demand needs so they can dismiss using alternative schemes to provide fresh water for our needs on the grounds that these alternatives would be insufficient to meet demand. This way they wholly dismiss all plans to build more reservoirs to capture the plentiful supply of rainwater. They dismiss improvements to abstract river water from nearer the tidal zone when in wintertime there is plenty of water in the rivers and when abstraction would not threaten wildlife. They make a token gesture to improving infrastructure to markedly reduce water leaks. That they dismiss all these options leads one to consider that their plan is primarily a means to 'feather their own nest' from a financial point of view. Their plans are so energy intensive and, as previously stated, commit them to using the high energy method 365 days of every year and we shall pay the price.<br><br>5 – It is of considerable concern that Southern Water would appear to be manipulating the Investment Model to prevent the selection of smaller more sustainable schemes until after 2030, in favour of continued use of drought permits on the Test and Itchen, and the selection of larger schemes which cannot be delivered until later, to make sure the Company get the solution they want selected, which delivers more guaranteed profits.<br><br>6 – The scheme is incredibly energy intense. To pump treated effluent up to Havant Thicket Reservoir and then transfer the water over to Otterbourne some 40+ kilometres away will require considerable energy. As such this method has a very high carbon impact and will result in release of considerable greenhouse gases. This process will occur every day of the year, year on year, regardless of the rain that falls during the winter, regardless of the huge volume of water that flows from our rivers to the sea.<br><br>7 – Southern Water say they are committed to net zero by 2030 yet their scheme is probably one of the most energy demanding schemes that could be devised.<br><br>8 – That Southern Water's plans to reduce water leakage are so poor is of grave concern. We pay for that lost water and they profit from that lost water! Their timescale to make improvements is wholly inadequate. Far too much water is leaked.<br><br>9 - It goes beyond crass stupidity that Southern Water plan to build on the old landfill site on Broadmarsh. Given their atrocious record of water leaks and deliberate sewage releases I have absolutely no faith that they can build on the landfill site without there being a calamity, if not a catastrophe. The potential for leakage of obnoxious substances is just too high a price to pay.<br><br>Anyone of the above points I draw to your attention should be sufficient to turn down Southern Water's plan. Collectively these points, and you will receive many others, conclusively shows that Southern Water's plan is absolutely and wholly unacceptable. It is a plan that ensures a high cash flow, daily return for Southern Water's stakeholders at our expense. Further, should it | relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable as a result of the reduction in abstraction licences on the whole river and groundwater system and potential impact on migratory fish. New reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>3. It is our desire to avoid use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for HWTWRP, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>4. Sea tankering has been removed from fdWRMP24.<br><br>5. For dWRMP24 we, together with the other Water Resources South East (WRSE) companies, commissioned Edge Analytics to provide population growth forecasts, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam.<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning |

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| | be accepted by yourselves, it sets a very dangerous precedent for future schemes. You have amongst other sound reasons for refusal such as scientific and financial, a moral obligation to refuse this plan. | approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>5. The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences. The licences typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amounts of water from these sources during wet periods. The availability of excess water does not mean that we can exceed the volumes permitted in our abstraction licences. The treatment capacity of our sources typically corresponds to the licence or the demand in the area supplied by the source.<br><br>6. Regarding the carbon impact of water recycling, following reductions in abstraction licences as outlined above, in some areas we need to look for alternative sources of supply. This will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>7. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>8. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies |

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| | | in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>9. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP923 | As a resident of Rowlands Castle - Please see below objections:<br><br>Further to Southern Water's (SW) last draft Water Resources Management Plan in 2023, which included [redacted] effluent recycling via Havant Thicket Reservoir, being rejected, it would appear that they have now just recycled the same old leaky Plan, with more effluent recycling, but this time they are also proposing to tanker water all the way from Norway to Southampton in a drought to plug the gap in their plan to 2035! Even SW previously rejected tankering from Norway as a stupid idea (very expensive and environmentally unsound, with the risk of importing non-native species), but rather than look at more sustainable options that might undermine their case for recycling effluent they have effectively recycled their old Plan giving lots of reasons why the better options cannot be developed quickly enough and the effluent recycling scheme still remains their best option.<br><br>FACTS:<br><br>* In the UK we only collect 1% of rainfall. We need a better plan that works with climate change to collect more water in the predicted wetter winters and to store it for use in drier summers, using underground confined aquifers and by building new reservoirs. Instead, SW proposes energy and chemical hungry effluent recycling from which it and its owners will be able to profit very considerably over many years from both construction and operation. The recycling plant will be located on an old landfill site on the coast at Broadmarsh (Havant), with | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>We acknowledge concerns raised about the need for the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment.<br><br>Regarding the carbon impact of water recycling, following reductions in abstraction licences as outlined above, we need to look for alternative sources of supply. This will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline |

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| | piling and tunnelling putting Langstone Harbour at risk from leachate and the recycled water will be pumped up to Havant Thicket Reservoir and then 40kms to [redacted]. The current building costs are £1.2billion and spiralling. We need a radical rethink on where and how the company takes water from the environment, for example moving its abstraction points closer to the sea to leave freshwater in our precious chalk streams for longer.<br>* It is shocking that SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet SW's slow programme for improvements means even by 2050 SW will still be leaking about 10% of all the water it treats, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious leakage and mains replacement programme SW will never get leakage under control.<br>* An industry leakage expert tells us if SW put the funding and priority in, SW should be striving to achieve a 70 % reduction in leakage by 2050 (not the 53% target in its plan).<br>* In West Sussex, SW has not taken action to connect up its network and as a result SW is dismissing options because it can't get the water to where it is needed. Why is SW not connecting up the network? It is because they want to get the recycling schemes underway first.<br><br>If the Plan goes through, the use of very expensive effluent recycling schemes will effectively have been approved and SW will be able to carry on and build these schemes at great cost to its customers and the environment.<br><br>All unacceptable. | emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>Regarding storage, our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>We have also considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | | The options requirement for network enhancements in the Central area (which includes West Sussex) were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29. |
| WRMP924 | I wish to object to the Southern Water Revised Water Resources Management Plan.<br>Key Concerns:<br><br>1. Effluent Recycling Risks: SW's plan relies heavily on energy-intensive effluent recycling. The proposed plant at Broadmarsh (Havant) would be built on an old landfill site, risking contamination of Langstone Harbour through leachate during construction.<br><br>This recycled water would be pumped to Havant Thicket Reservoir and then transported 40 km to [redacted], with an estimated cost already at £1.2 billion and rising.<br><br>2. Leakage Mismanagement: SW loses 100 million liters of treated water daily through leaks—19% of their supply. Even by 2050, they plan to waste 10%. Leakage experts say a 70% reduction by 2050 is achievable, but SW's target is only 53%. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. We acknowledge concerns raised about the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reductions in the amount of water we can take from the Test and Itchen rivers, we need to find sustainable alternatives. In addition, the length of pipeline adds to energy use, but is essential to move water around the network between existing treatment and supply infrastructure. To address the potential environmental impacts of HWTWRP, including increased energy usage, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

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| | 3. Absurd Alternatives: SW's proposal to tanker water from Norway—an idea they previously dismissed as expensive, environmentally unsound, and risky for importing invasive species—shows their desperation to defend unsustainable recycling schemes.<br><br>4. Sustainable Options Ignored: SW dismisses sustainable solutions like expanding reservoirs, using aquifer storage, or improving the network to move water efficiently, claiming these aren't feasible within their timeline.<br><br>5. Potential Price Hikes: If Portsmouth Water merges with SW, all customers may face significant bill increases to fund these costly projects. | 2. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>3. Sea tankering has now been removed from fdWRMP24<br><br>4. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>5. Southern Water and Portsmouth Water are entirely separate and independent companies but have commercial arrangements to transfer water across their respective boundaries. Portsmouth Water is a 'Water Only Company' meaning that within its area, it provides only potable water services. Southern Water provides wastewater services in the area Portsmouth Water supplies for water. Southern Water is not discussing changes to the current licence to operate arrangements and company mergers are not considered to be part of this consultation process. HWTWRP is being funded by Southern Water. Like all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across our own water supply customers' bills across our region. As with all our costs and charges to customers, funding for HWTWRP will be subject to approval by our economic regulator, Ofwat. We |

| Reference | Feedback | Southern Water Response |
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| | | anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year.<br>. |
| WRMP925 | Regarding the revised draft Water Resources Management Plan by Southern Water I am would like to make the following observations as I am vehimently opposed to this direction.<br><br>Southern Water (SW) have not completed a full review of the plan considering all the alternatives<br><br>SW are not responsible people to deal with our drinking water and if they were to fix their leaks there would be no need to recycle sewage water for drinking.<br><br>With predicted changes in climate more should be made to capture the rainwater.<br><br>SW should focus more on suitable options rather than recycle sewage for drinking.<br><br>Taking water from Norway in Tankers is not a viable option<br><br>SW leakage is 100 million litres per day (19%) of water and this should be brought under control.<br><br>Reading all the information the Hampshire efffluent recyling scheme does not represent the best value for customers.<br><br>Details of the water quality on the new reservoir are not available and the scheme should not move forware until the environemental risks/impacts are known<br><br>Moving the [redacted] abstraction to the tidal limit would be a better and more sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought.Moving rivier abstraction to the tidal limits can have enviromental benefits.<br><br>More targets should be set for delivery of groundwater boreholes schemes as they require minimum infrastructure and DEFRA should challebnge this.<br><br>The West Sussex network should be upgraded. Upgrades are already taking place in Hampshire.<br><br>SW seem to be putting all their eggs in one basket surely it is better to implement smaller schemes where water is needed many of which do not require new consents - just treatment plants and boreholes.<br><br>More effort should be put into withing with non domestic usage to reduce their use of drinking water for non potable uses | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as the Hampshire Water Transfer and Water Resources Project (HWTWRP). Reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. Leakage reduction will help, but alone it cannot resolve the deficit. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>HWTWRP is being funded in the same way as all our costs; funding for new infrastructure and improvements on the water supply side of the business is averaged across water supply customers' bills across our region. As with all costs and charges to customers, funding for |

| Reference | Feedback | Southern Water Response |
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| | Consumers in the areas affected DID NOT have the options to comment at the formative stage of the plan.<br><br>I am sure that I am not in the minority as at a recent meeting the majority was of the same opinion as myself and I trust you will take all all the points into account for rejecting the SW proposals. | HWTWRP will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of HWTWRP once built, to reduce the impact on bills in any one year. The Project is continuing to be developed. We currently estimate that its cost to each of our water supply customers would be approximately £2.50 a month over a 20-year period.<br><br>HWTWRP held a consultation on water quality in March 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The full report is available to download here https://www.hampshirewtwrp.co.uk/EnvironmentalWaterQualityReport.pdf<br><br>To address water quality and other potential environmental impacts, including increased energy usage, of HWTWRP, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Recycled water options are generally only considered in areas where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). HWTWRP is designed to provide water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. |

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| | | The options requirement for network enhancements in the Central area (which includes West Sussex) were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. The consultation was advertised to all of our customers via our newsletter. Previous respondents and local MPs and Stakeholders were directly contacted with information. We have received 1,176 responses as part of rdWRMP24 consultation and have met the visibility standards within the guidance. We do welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations. |
| WRMP926 | I have massive concerns about what Southern Water are doing - I live very close to this area, and I find it unacceptable that the plans have changed.<br><br>The UK collects only 1% of rainfall, despite predictions of wetter winters. Instead of working with climate change by storing surplus winter water, Southern Water proposes energy-intensive, profit-driven schemes that harm the environment and burden customers for decades.<br><br>The SW revised draft plan does not strive to work with predicted changes to our climate, which modelling has shown means we will get wetter winters and drier summers.<br>We need a strategy that includes;<br><br>Moving abstractions (river and boreholes) to the bottom of the catchments,<br>Collecting more water in winter and storing it for use in dry summers.<br>This would reduce environmental impacts and allow the extent to which abstraction reform is required to be reduced. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. We acknowledge concerns raised about the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect. |

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| | The main concerns I have are below<br>1. Effluent Recycling Risks: SW's plan relies heavily on energy-intensive effluent recycling. The proposed plant at Broadmarsh (Havant) would be built on an old landfill site, risking contamination of Langstone Harbour through leachate during construction. This recycled water would be pumped to Havant Thicket Reservoir and then transported 40 km to [redacted], with an estimated cost already at £1.2 billion and rising.<br><br>2. Leakage Mismanagement: SW loses 100 million liters of treated water daily through leaks—19% of their supply. Even by 2050, they plan to waste 10%. Leakage experts say a 70% reduction by 2050 is achievable, but SW's target is only 53%.<br><br>3. Absurd Alternatives: SW's proposal to tanker water from Norway—an idea they previously dismissed as expensive, environmentally unsound, and risky for importing invasive species—shows their desperation to defend unsustainable recycling schemes.<br><br>4. Sustainable Options Ignored: SW dismisses sustainable solutions like expanding reservoirs, using aquifer storage, or improving the network to move water efficiently, claiming these aren't feasible within their timeline.<br><br>5. Potential Price Hikes: If Portsmouth Water merges with SW, all customers may face significant bill increases to fund these costly projects. | Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reductions in the amount of water we can take from the Test and Itchen rivers, we need to find sustainable alternatives. In addition, the length of pipeline adds to energy use, but is essential to move water around the network between existing treatment and supply infrastructure. To address the potential environmental impacts of HWTWRP, including increased energy usage, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk.<br><br>Regarding the location of the recycling plant, building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>2. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>3. Sea tankering has now been removed from fdWRMP24<br><br>4. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Our plan includes building two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. It also includes provision for building another one in Sussex. A Chalk Managed Aquifer Recharge (MAR) |

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| | | feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>5. Southern Water and Portsmouth Water are entirely separate and independent companies but have commercial arrangements to transfer water across their respective boundaries. Portsmouth Water is a 'Water Only Company' meaning that within its area, it provides only potable water services. Southern Water provides wastewater services in the area Portsmouth Water supplies for water. Southern Water is not discussing changes to the current licence to operate arrangements and company mergers are not considered to be part of this consultation process. HWTWRP is being funded by Southern Water. Like all our costs, funding for new infrastructure and improvements on the water supply side of the business is averaged across our own water supply customers' bills across our region. As with all our costs and charges to customers, funding for HWTWRP will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year.<br>. |
| WRMP927 | Does Southern Water own Portsmouth Water and can they run roughshod over it?<br>The new reservoir was always intended to be for fresh drinking water pumped out of the chalk. Now as I understand it Southern Water are proposing to grab it as a dumping ground for their effluent. Please stop this appalling proposal dead in its tracks<br>Wishing to stay healthy | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. Purified recycled water is water that has gone through a series of advanced treatment techniques before being pumped into a river, lake or reservoir – from where it can be taken and treated to strict drinking water standards before being sent into supply. All water we supply to customers must meet strict UK drinking water standards, as enforced by the Drinking Water Inspectorate, and this will also be the case for water supplied by the Hampshire Water Transfer and Water Recycling Project (HWTWRP). We are working closely with international experts, regulators and environmental organisations to develop the plans to ensure that there will be no negative impact on the environment or human health from recycled water either in the short or long term. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP928 | I am writing to express my concern and reject Southern Water's propose plan to recycle sewage effluent into Drinking water. The plans have huge environmental concerns<br><br>There are cheaper greener solutions | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource |

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| | 1 The UK collects only 1 percent of rainfall ,despite predictions of wetter winters<br><br>2 Repairing leaking water pipes which accounts for a loss of 19 per cent of Southern Water's supply losing 100million litres of treated water daily<br><br>3 Investigate groundwater borehole schemes ,and aquifer storage, they require minimum infrastructure and are within the company's control and would protect the Rivers Test and Itchen from drought orders<br><br>If this plan were agreed there is a risk of drinking water tasting differently as after treatment minerals have to be added to the water before it reaches our taps and this could drive people to use bottled water and this would have a huge envioronmental impact<br><br>There is a complete breakdown in Southern Water especially with the recent news in the National Press that Southern Water grading has been downgraded to 'junk' the only company to be downgraded in this way. | projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>1. Recycled water options are generally only considered where the groundwater is deemed to be no longer available, due to the underlying baseline needs of the environment (under environmental regulations). HWTWRP is designed to provide water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | | Regarding the water tasting different, just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. We don't expect customers to buy bottled water when the water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. All water companies' provision of public supply is regulated by the Drinking Water Inspectorate, and further information about water recycling can be found on their website; https://www.dwi.gov.uk/water-recycling/<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders. They have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans. |
| WRMP929 | I wish to object to Southern Water's revised plan to recycle effluent back into our drinking water and demand that a better, more sustainable way forward by selecting options that work with climate change to store winter water and not against it. Southern Water have selected options that are high energy and carbon hungry solutions. Southern Water need to invest more to repair leaks and replace main sewer to cope with our changing climate and conserve this important resource. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Water recycling inevitably uses more energy than abstraction from conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, due to reductions in the amount of water we can take from the Test and Itchen rivers, we need to find sustainable alternatives. In addition, the length of pipeline adds to energy use, but is essential to move water around the network between existing treatment and supply infrastructure. To address the potential environmental impacts, including increased energy usage, of HWTWRP, we are undertaking a range of environmental assessments as part of the Environmental Impact Assessment (EIA) process, to understand the potential effects of HWTWRP on the environment. A Preliminary Environmental Information Report, which is a key part of the EIA process, is available at https://www.hampshirewtwrp.co.uk.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP930 | I am concerned about SW's unsustainable proposals and demand better solutions, such as fixing leaks, developing reservoirs, and utilising aquifer storage as an alternative to Effluent Recycling. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the |

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| | | county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as aquifer storage. As outlined above, reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These additional options will help, but cannot resolve the deficit alone. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding developing additional storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is also considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |
| WRMP931 | I am opposed to Southern Water building a plant for recycling final effluent from sewerage works to use for drinking water.<br><br>We need to collect our rainfall more efficiently, as only 1% of rainfall is collected at present! This is amazing considering the rainfall we have in the UK.<br>We need to either build more dams or underground confined aquifiers, instead of a highly carbon hungry plant.<br><br>Our environment is at risk tunneling and piling which would cause leakage in Langstone Harbour, where all the wildlife will be at risk.<br>It needs to be closer to the sea to leave freshwater in our chalk streams. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is just one of many water resource projects/options contained in our Water Resources Management Plan (WRMP) covering our supply areas across Hampshire, Sussex and Kent.<br><br>We acknowledge concerns raised about the need for HWTWRP and whether it's the right solution. Water scarcity is a very real issue in the South East of England, which needs to find more than 2,500 million extra litres of water a day by 2050 to maintain public supplies. Having a resilient water supply, especially in times of drought, is something that we must plan for. In Hampshire, the challenge is especially acute due to the need to reduce abstractions from the |

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| | It is also shocking that Southern Water loose 100 million litres of water a day to leaks! We need to stop the leaks quickly.<br><br>The environment needs to come before profit. | county's chalk streams and aquifers and is compounded by climate change and a growing population. Relying on winter rainfall to fill a reservoir is not an option when consecutive dry winters mean river abstractions to fill them are not available. Reservoirs are a crucial part of a resilient water supply network but are not enough to meet the planned deficit during drought conditions and further new drought resilient solutions are required. A truly drought-resilient approach is to use water recycling to supplement the reservoirs and ensure a ready supply of water that does not need to be taken from the environment we are trying to protect.<br><br>Regarding developing additional storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is also considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish, such as salmon. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Leakage reduction is included in our rdWRMP24 in addition to other water resources options, such as aquifer storage. As outlined above, reductions in the amount of water we can take from the Test and Itchen rivers means we have a shortfall of some 192 million litres of water a day during a drought. These additional options will help, but cannot resolve the deficit alone. The chalk streams support a wide variety of species and deserve protection, but they also supply water to more than 750,000 people. We need to find new sustainable sources of water and HWTWRP will make up a significant percentage of this deficit, providing 90 million litres of water per day to residents in Hampshire. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP932 | I am extremely concerned about the proposed use of Havant Thicket Reservoir by Southern Water to recycle sewage effluent into drinking water that will then be supplied back to | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | customers as "fresh" drinking water. The sewage treatment works cannot take all of the chemicals, pharmaceuticals, illegal drugs etc. out of the water in the recycling process.<br><br>Southern Waters latest Draft Plan does not seem to make best use of our natural resources in that there is no plan to capture rain water in the wetter months for use during the dryer summer months. Our iconic and rare chalk streams should not be put under increasing pressure to supply water. These Chalk streams are extremely rare worldwide and support a fantastic array of wildlife which are under increasing threat by things like over abstraction, farm run off and raw sewage being discharged into them. It is an absolute disgrace that our precious rivers and streams have been treated this way. We must stop the over abstraction of our local chalk streams.<br><br>The proposal in the Southern Water Draft Plan to tanker water from Norway during periods of drought is not sustainable or environmentally friendly. Rainfall collection and storage would be a far more sustainable plan to see in the Southern Water Plan.<br><br>Southern Water loses 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control. This is an absolute disgrace!<br><br>Southern Water Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known. The water quality in Langstone Harbour is already hugely unacceptable with very high concentrations of chemicals, prescription and lifestyle choice drugs, hormones etc. that are having a detrimental effect on our already struggling wildlife in these areas.<br><br>I am seeking reassurance that this scheme will not be given the Go Ahead in its current state. We are already one of the most nature depleted countries on the planet, this scheme will only make this statistic worse and there is a grave concern that human life will also be at risk with this plan.<br><br>I look forward to receiving your response. | We acknowledge concerns raised about the Hampshire Water Transfer and Water Recycling Project (HWTWRP) and whether it's the right solution. The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced. All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. HWTWRP is designed to provide water resources during droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will also help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex. We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions.<br><br>Regarding sea tankering, this has now been removed from the plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>HWTWRP held a further consultation on water quality in March 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The Environmental Water Quality Report in summary, shows that changes in water quality in Langstone Harbour would be small and are not expected to have any impact on biodiversity. The report also confirms that reject water from the water recycling process, which will be released into the Solent, is unlikely to affect water quality or the biodiversity of |

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| | | the Solent. The full report is available to download here https://www.hampshirewtwrp.co.uk/EnvironmentalWaterQualityReport.pdf . |
| WRMP933 | The following are some of my concerns having read through the proposal by Southern Water using the reservoir being built in Havant thicket at this time.<br><br>1. As local inhabitants we were misled into thinking this reservoir would be a site for clean water storage from chalk streams and provide an area for some water sports, and recreational usage – good for the local wildlife, flora and fauna and for people. This has now changed to being part of an effluent recycling scheme.<br><br>2. The way this scheme is supposed to work with the osmosis process is relatively new so how do we know it will work safely and well.<br><br>3. This scheme is billed as a Drought Solution. Why not develop a scheme that will collect and store the naturally occurring rainfall of the winter months in aquifers. We are told that the winters are likely to become wetter.<br><br>4. There are significant risks attached to developing this effluent recycling plant on top of a previous landfill site used to dump all sorts of industrial waste beside Langstone Harbour. The risk of problems occurring leading to contamination on land and in the sea is high, there must be safer and more accessible sites. For a start, building it so far from the final destination 40km away will cost a fortune in devising and building pipelines to transport the water.<br><br>5. I understand that the taste of the water from the tap will change when/if the scheme is eventually finished and so likely to push more people into buying bottled water in plastic bottles which adds to a devastating pollution problem.<br><br>6. I have also heard suggested that in times of drought Southern Water will tanker over water from Norway. The cost of that and the environmental implications are beyond imagining.<br><br>7. Who will pay for this? The local general public of course in terms of disruption to roads, land and through increased water bills. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1.<br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>2.<br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>3.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>4.<br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>5.<br>Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>6.<br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>7. |

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| | Please require Southern Water to come up with NEW proposals, not slightly altered previously rejected ones. Proposals that are more viable in the long term, store the naturally occurring rain water, are less costly to the environment and our purses, less disruptive in terms of infrastructure and are sited closer to where the need for water is.<br><br>I sincerely hope that the proposal will be seriously reviewed and revised to achieve the goal of managing precious water in a sustainable way and incorporating the collecting of enormous amounts of rainfall we get in the winter month. | A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP934 | I am appalled at the revised proposal put forward by Southern Water in relation to the recycling of effluent for the new reservoir currently under construction at Havant Thicket.<br><br>When the original plan was shared, some number of years ago, there were plans for the reservoir to also become a local amenity, with activities such as boating and fishing as well as various walkways. At the time, it seemed to be a reasonable compromise in terms of usage and local amenity vs. a much needed resource, considering the huge impact on the natural habitat destroyed in the process of building it.<br><br>The current plan is of course much different, with the ridiculous idea of, in the event of drought, bringing water from Norway by tanker (at huge financial and environmental cost) as well as pumping water from the reservoir 40km to the [redacted] installation 24 hours a day, 12 months a year (another power-intensive operation), not to mention the health risks of drinking recycled water, especially in the event of equipment failure, and the pollution risks to Langstone Harbour from potential leachate from the Broadmarsh site.<br><br>At the same time, Southern Water seems unconcerned at the huge amount of water leakage from the existing distribution system. Surely, it would be better to focus more on reducing this leakage and, at the same time, increasing the percentage of rainfall collected from the current (national) 1% figure, which seems derisory. Such additional rainfall collection would then need minimal processing as opposed to the cost, energy and risk of the proposed effluent recycling scheme. And given the current levels of effluent discharge into the sea, based on the current failure rates within their water processing system, I have every expectation that these breaches would increase, causing further damage to our precious offshore natural environment.<br><br>This entire project smacks of someone who came up with the original hair-brained idea being determined to see it through irrespective of hurdles, costs and other reasoned arguments being put forward, not wanting to lose face, rather than admitting it was a stupid idea in the first place. I can only hope that common sense prevails and that the latest plan is thrown rejected with the additional caveat that and subsequent proposals take ecology into account rather than dogma and profit. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. |
| WRMP935 | I am writing to object to Southern Water's proposal to recycle effluent from [redacted] to the new reservoir at Havant Thicket. I have lived in Rowland's Castle (a village adjacent to Havant Thicket) for 20 years and the proposed recycling scheme is a major shift from the solution | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | Southern Water promoted and discussed with local residents during the reservoir planning application phase.<br>I am objecting to the proposed WRMP scheme on the grounds below:<br>It is environmentally unsustainable and a massive waste of investment, engineering and energy<br>SW should focus on reducing the substantial leaks of potable water from the current network<br>The chalk rivers of the Itchen and Test could be protected better through the far more environmentally friendly solution of re-siting abstraction points closer to the tidal limit than importing recycled water across large distances from out of catchment locations.<br>Southern Water's track record on transparency and probity is poor and the proposed WRMP technology is expensive and untested commercially in UK. | Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process. |
| WRMP936 | Following the rejection of Southern Water's draft Water Resources Management Plan last year, based on major objections from the residents (customers of Southern Water and Portsmouth Water) and the regulators, Southern Water has decided not to reevaluate their proposals or look seriously at faster, lower cost and sustainable solutions recommended by everyone except Southern Water.<br><br>Instead, Southern Water have just regurgitated the same [redacted] retreatment and reuse of the Havant Thicket plan to supply Southampton – but now with the addition of some unsustainable options such as stopping all abstraction from our rivers (which is unnecessary) and buying water from Norway – looks like a sacrificial ploy to redirect attention. The original and approved plan for Havant Thicket to serve the Portsmouth Water customer-base does not even get a mention.<br><br>• At no stage in either Plan has Southern Water followed the guidelines to ensure meaningful community engagement during the formative stages. Why are Southern Water allowed to | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A. |

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| | disregard this directive? In addition, Southern Water have not satisfied a legal requirement for a new statutory consultation on the treatment works proposed.<br><br>• The key documents on alternative solutions are hidden away in a safe at their HQ under a national security banner – as a consequence there is no evidence of any reappraisal by Southern Water in the public domain. There can be no reasonable justification for the alternatives to be secret when Southern Water's chosen option is not!<br><br>• The Southern Water option remains as cleaning up the waste water from [redacted], mixing it with the existing spring water in Havant Thicket (now used as a storage buffer) and transporting the result 40km to Southampton. The cost of this solution, when completed sometime after 2035, will be close to £2billion. (We could have six new reservoirs for that kind of money, all of which could be sited nearer the areas of need. The proposed sites for the Retreatment Works and links to Budds Farm are in an area of rising flood risk and are on top of two toxic waste dumps.) Putting all our eggs in Southern Water's single basket demands a much higher level of scrutiny over the alternatives by an independent authority. This is probably the most expensive solution for us who have to pay – but the most economically beneficial for Southern Water.<br><br>• The facts to consider are that the UK is projected to be getting warmer and wetter. We currently only save 1% of the rainfall, and 25% of Southern Water's output is lost o leakage. So the primary objective should be to store the water when excess is available – ie of the time – for use during periods of drought. The better solutions include:<br>- Fix the leaks<br>- Move all river abstractions to the point where they meet the sea<br>- Plan more reservoirs and aquifer storage – three reservoir sites are already identified<br>- Look to open up unused and private abstraction permissions<br>- Use the existing Hampshire water grid to move water around<br><br>These solutions would satisfy the need without the most expensive and unnecessary high-tech solution, which only Southern Water favours.<br>It cannot be acceptable for the people who will have to pay for whatever solutions are chosen to have no say in the strategy or preferred options.<br>On top of this, Southern Water have included a new short-term stopgap – starting up an eight-strong tanker fleet at huge cost to ship water from Norway to Southampton to a new treatment works to clean and remineralise the water, and then pour it into the rivers. This proposal leaves all of the communities speechless !<br><br>We are looking to you, Secretary of State Reed, to inject a sense of proportion and reality into this matter, and to commission a complete independent review of the sustainable options, leading to a meaningful engagement with all stakeholders. | We released a press release regarding the consultation, which was picked up by major newspapers; *The Guardian* and the *Financial Times*. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.MPs, stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022–2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |

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| | | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Regarding the use of under-utilised private supplies, this is an option we are reviewing in 2025 as part of the next Water Resources Management Plan.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan. |
| WRMP937 | I am writing to lodge my objections to Southern Water's Effluent Recycling Draft plan. Having read the wealth of information there is, it is astonishing that Southern Water proposes such a plan which, on any level, is not acceptable. Southern Water has a chance to redress some of the many things they have done wrong by getting it right this time. What they propose is not getting it right. They have an opportunity to develop a plan that is sustainable and I plead with you to listen to my concerns and the concerns/objections of others. I am not an articulate person and I have reused some of the wording that I have read but it nonetheless reflects how I feel.<br><br>Tankering in water from Norway during a drought is not a sound proposal. It just plugs a gap and is expensive and unsustainable. Customers and the environment deserve a better proposal. The cost to customers of tankering in water will be enormous. There would be an ecological impact by placing temporary pipelines along the River Test. There is a risk of leakage if a pipe bursts, which could impact fish and other species that use the river, as well as the risk of importing non-native species. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the financial costs of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much |

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| | Just in the past few days alone, we have had so much rainfall and new reservoirs have to be an answer. We get a great deal more rain due to climate change and creating new reservoirs would not only store more water but would be beneficial to wildlife and provide recreation for our communities. So little of the rainfall in the UK is collected and this is scandalous. Confined underground aquifers to store winter water are used around the World and I believe Southern Water should undertake investigation and development now not delay until 2029. Southern Water already own the land to do this and it has already been assessed to have no likely impact on the River Test. Trials for a similar scheme were successful in Dorset.<br><br>Southern Water has an unacceptable record of failures with regard to pollution incidents and it is difficult to trust them to operate a complicated effluent recycling system. I don't want apologies after an event or for Southern Water to say we will learn from our mistakes, after another failure (and there will be one), I want a sound, environmentally friendly plan that is based on doing the right thing, not the most profitable things. There is a significant additional risk of pollution from the proposed recycling plant, especially if it is not maintained correctly.<br><br>Southern Water need to be thorough and prompt in reducing leakage losses. I reported a leakage of water to them and it took many phone calls and many weeks before they repaired the leak. When this is multiplied catchment wide, it is appalling how much water is wasted. There was also another incident which I reported, in a cold snap. The water leaking spilled onto the pavement and iced over and many people, including me, slipped on the ice. I finished up in A&E. Again, it took several weeks before the leak was fixed.<br><br>It is possible for Southern Water to move river abstractions closer to the tidal limit. If they did this, it would protect many miles of the main river from public water abstraction, as well as providing benefits to the Itchen and other channels. Also, it would largely resolve the immediate problem in Hampshire.<br><br>This is a high energy proposal, making it hard to believe that it will provide good value. There has been inadequate public consultation before effluent recycling options were selected.<br><br>There is an enormous amount of concern about the environmental impact of effluent recycling schemes, particularly with the discharge to the Solent. The discharge will be significantly more concentrated than the existing sewage effluent discharged.<br><br>I would ask DEFRA to encourage development of sustainable solutions.<br><br>Southern Water are proposing the second highest increase in Water Rate charges in the country, something which is incredibly unfair. All water charges should be the same countrywide. Southern Water should do the right thing and put forward an alternative proposal, which is environmentally sound.<br><br>Thank you for reading my objections. | shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| WRMP938 | I should like to put on record, that I wish to add just some of my serious worries about the above plans that I have encountered so far, and to support any objections to them already sent to you, which resonate with me.<br><br>In spite of information to the contrary, I have heard little by way of public consultation with S.W. The question, were it put, is easy to answer: Would you rather the source of your drinking water come from river, spring or ground water, or alternatively from recycled effluent ? To my way of thinking, there is only one acceptable answer. Forty so-called consultation documents are hardly likely to be bedtime reading for many. Were they really consultations or is the quantity solely to put off objectors? Even the assurances given by S.W. that appropriate information on water effluent recycling would be available for 2024 consultations, have apparently not been met and, I believe, some critical documents have even been restricted. Why, I wonder?<br><br>With the world currently seriously focussed on overcoming Climate Change, I have yet to see anything that shows that S.W. are including it in their own concerns and remedies. Their plans are not long-term but seem more to be stop-gap answers. I will not burden you with repeating all of the many arguments I have read, put forward by more knowledgeable even more concerned people who have doubtless written to you already at length, with intelligent solutions for your consideration. Those I sincerely trust you will take heed of, and act accordingly, but I will venture to mention just a few supporting comments which I have noted. These I hope, will continue to show you how many people are not satisfied with S.W.'s Revised Plans, and ask you to reject them.<br><br>This year more than any I can remember, has seen more rain, flooding, damage to homes and unhappiness for many people because of it, than ever before. To try and remedy this in any ways at our disposal, should be paramount in any solutions, and to endeavour to harness so much 'free' water, of which, to date I gather, we collect only one percent. Options that work with predicted climate changes should have been included in the revised draft plan. We can't just ignore it. Surely it is not beyond the skilled in that area, to devise suitable solutions. I have seen some ideas mentioned. For instance: Ground water schemes on the I.O.W. like free water-butt schemes, could be used in the South West; other reservoir schemes; making as a priority schemes to increase the capacity at existing works; network upgrades, as in Hampshire; and apparently more investigation of aquifer storage schemes also in Hampshire; W. S0u0ssex and the I.O.W.are not being prioritised. Surely these are urgent? Too many possibilities seem to be being ignored. Instead, their plan focuses on how they can fill the supply deficit in a drought before the previously selected effluent recycling schemes are due to operate. The final straw is, as I understand it, that effluent recycling and transfer via Havant Thicket, which is close to me, and due to be available in 2035 results in unacceptably high carbon impact and greenhouse emissions. Aren't we trying to reduce these emissions overall? It will ultimately transfer recycled water via long pipelines that have to operate every day (not just in a drought) to [redacted] (near Winchester, Southampton and the I.O.W) plus W. Sussex. Portsmouth Water customers will also receive the recycled effluent to their taps when the reservoir is used, | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket.<br><br>We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) on in 2022–2023 and, following changes, we consulted on our revised draft WRMP24 in 2024. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1176 responses as part of rdWRMP24 consultation.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket |

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| | initially in a drought or emergency, but from 2040 more routinely. If it cannot be delivered by 2030 S.W. will reject it. We need sustainable solutions available for use in 2035 and beyond. Sadly, I am unlikely to around to benefit by then, but many who care will be.<br><br>As for tankering water from Norway in a drought, I've never heard anything so ridiculous in all my nearly 89 years, not to mention the actual cost, and the challenge such a scheme would present. The idea is surely not sustainable. We should rely on our own abilities and solutions, which are many if only we look for them. Surely it is not beyond the brightest brains in our own country to devise some way of saving the generous rainfall we have had and, doubtless, will continue to have, if we do nothing to save it ourselves.<br><br>I understand that S.W. have not taken into consideration the completion of the Hampshire Grid Improvement Programme, which should be available from 2030. This would transfer water within Hampshire by merging existing zones and, if taken into account, could have changed the options appraisal process. Sounds reasonable to me.<br><br>My final observation is that S.W. have shown no interest in preventing water leakage in their system? Do they know how to do it? There has been no sign so far as I am aware. I understand that S.W. loses 100 million litres of treated water daily through leaks - 19 percent of their supply. If they have no plans for control in that direction, then any other options for us to save water will be in vain as far as, I am reliably informed, up to and beyond 2050! Save it with one hand and then lose it with the other is unacceptable.<br><br>As an old lady who cares, but will not be around to benefit, please reject their profit driven plans and ask them to consult again properly and seriously, those who have reliable and sustainable solutions. This seems to be a once-in-a-generation chance to find the right solutions and I, and others who care very much, feel we do have the right people to offer them, if only S.W. will bother to do so..<br><br>Yours ever hopeful, | Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |
| WRMP939 | We are residents of Rowland's Castle and have serious concerns about SW's revised,ununsustainable,plans .<br><br>Instead of spending insane amounts of money on new plans why are they ignoring improving their current network to make it more efficient and | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement |

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| | sustainable including reduction of water leakage.<br><br>Instead they want to build at Broadmarsh ,which will possibly,probably,contaminate Langstone Harbour plus the high cost of transporting the recycled water .<br><br>Add to that the cost of paying to tanker water from Norway ,seriously?<br><br>It is predicted that we will experience wetter winters so why are there not plans to collect and store rain water ?<br><br>On a side note a lot of people have expressed concern about drinking effluent recycled water so would that not led to an increase usage of water in PLASTIC bottles ? | programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |
| WRMP940 | I object to this plan.<br><br>This plan ignores the United Kingdom Technical Advisory Group (UKTAG) report, United Kingdom Environmental Standards and Conditions. This report shows quite clearly that the flow of freshwater into the saline estuary of a river can be reduced by more than sufficient to meet any foreseeable shortfall.<br><br>By failing to recognise this report, the company is forced into continuing to take as much water as possible from inland waters. This will continue to cause environmental damage and it forces the company to look for alternate environmentally damaging, expensive, high energy use solutions. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding your view on the UKTAG report, your comment has been noted.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | The United Kingdom Technical Advisory Group was established by all parts involved in the water industry to transfer the terms of the European Union Water Framework Directive into UK regulation. Its proposals have been approved. Its recommendation that flows into estuaries can be reduced make it possible to obtain the necessary water with minimum power use.<br><br>This makes this draft water resources management plan, draft WRMP24, in clear contravention of the Paris Climate Agreement.<br><br>I have written a number of responses to both draft WRMP24 and WRMP19. Those responses are still to be taken into account. This is a plan based on failure. It can only work by telling the customers to use less water, up to 40% less water. Even then it finishes by telling the customers that, after they have reduced demand and paid £billions for new works, the company will still need to impose water restrictions. None of this would be necessary if the UKTAG report, United Kingdom Environmental Standards and Conditions, is implemented.<br><br>This plan, draft WRMP24 should not be approved until the industry, the regulators and the government properly asses the UKTAG report and determine whether or not it should be implemented. | We thank you for your engagement and feedback with our rdWRMP24 consultation. |
| WRMP941 | I consider key issues to be:<br><br>The amount of current leakage is high at 100 million litres/day and there is insufficient focus on reducing this as a priority, as a starting point.<br><br>Tankering in water from Norway cannot be considered a credible drought option – being very high cost, is a non-local solution with security implications – and risks importation of non-native flora contamination.<br><br>Much more should be made of capturing surplus winter rainfall and storing this for use in drought periods, including additional new reservoir schemes for the purpose.<br><br>The plan does not adequately protect the chalk aquifers and chalk streams. These would be better protected by extracting water downstream just before rivers meet the sea.<br>Population growth forecasts are not aligned with ONS statistics. Southern Water should be planning on population growth aligned with ONS and national government plans, which are lower, providing time to start again and develop alternative more sustainable and lower cost solutions<br><br>Waste streams from the proposed effluent treatment plants discharge into environmentally sensitive areas, with the potential for significant damage. Effluent treatment is also assumed to run 24hrs/day throughout the year, even when there is high rainfall, full rivers and reservoirs. This has a large cost and negative environmental impact.<br>Alternative plans are needed to reduce/eliminate dependency on effluent treatment and provide environmentally sustainable solutions | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | I urge you to reject the plan and direct Southern Water to develop alternative proposals that better address leaks, capture and store rainfall, protect chalk streams and aquifers, protect environmentally sensitive shorelines and are affordable<br><br>Thank you for considering my views | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP942 | The Southern Water proposals concerning Havant Thicket are ridiculous. There is surely a better way. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP943 | I write in response to the request for comments on the proposals by Southern Water to develop an effluent recycling scheme to provide additional water supply, principally in times of drought, in parts of southern Hampshire and West Sussex.<br><br>There are elements of this scheme which I find frankly most disturbing and I can only urge the Secretary of State to look very carefully at some of the detailed submissions that have been made by various interest groups who are concerned about these proposals. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>**1. Have the possibilities for the creation of new reservoirs, in addition to the Havant Thicket project, been fully considered?**<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | Several key points should be considered:<br><br>1. Have the possibilities for the creation of new reservoirs, in addition to the Havant Thicket project, been fully considered?<br><br>2. Would it not be more cost effective to spend resources on reducing the current rate of loss (about 19%) from the existing distribution network?<br><br>3. Climate change modelling suggests that we can expect warmer, wetter winters. Have the benefits of confined aquifer recharge schemes been fully explored. There are several possibilities for such schemes across the region. These can represent relatively simple, low-cost adjuncts to water supply for use, particularly in times of drought.<br><br>4.The effluent recycling scheme relies extensively on a complex engineering chain with reverse osmosis technology at its heart. Reverse osmosis is extensively used worldwide, principally for desalination and is now robust technology in that situation. However, it is highly energy intensive and the absolute requirement for the removal of solids before water is pumped through the reverse osmosis modules is a significant challenge. Also, it would be necessary for Southern Water to give absolute assurances that no inappropriate contaminants could pass through the process. This would not be the relatively simple desalination of seawater, rather the purification of contaminated effluent from a highly populated and intensively industrialised conurbation in southern Hampshire.<br><br>5. Moving the treated water from Havant to the distribution point in the Southampton area will require the construction of a 40km pipeline and building pumping stations, each of which will inevitably require significant energy input. Is this really an appropriate engineering solution?<br><br>6. Southern Water's fallback solution, in case of drought, is to bring water by tanker from Norway. The cost, the energy requirements, the ecological dangers and the distribution | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>**2. Would it not be more cost effective to spend resources on reducing the current rate of loss (about 19%) from the existing distribution network?**<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>**3. Have the benefits of confined aquifer recharge schemes been fully explored?**<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>**4. Concerns about the complexity and risks of reverse osmosis as a treatment method.**<br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br>**5. Concern about the energy use and infrastructure of transporting water 40km.**<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |

| Reference | Feedback | Southern Water Response |
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| | difficulties of bringing water to southern Hampshire in this way surely outweigh any possible benefits. To be frank, this is a ludicrous proposal.<br><br>I am far from convinced that effluent recycling is a sensible, cost effective and fully thought-through engineering solution to the issues surrounding the continuity of water supply in this region. I urge the Secretary of State to reject this proposal. | Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br>**6. Objection to the tanker plan to import water from Norway.**<br>Regarding the viability of sea tankering, this option is no longer included in our plan. |
| WRMP944 | The water industry has always recognised pumping water over long distances should only be used when all other option have been investigated due to energy requirements and consequent costs to customers<br>I am concerned by OFWATs proposal to fund the effluent recycle in Hampshire.The scheme uses the most resource hungry process then pumps for 40km for further processing.Customers will be shocked by the eventual cost and not at all impressed when possible alternative schemes come to light.<br>Energy security is already of significant concern, developing energy intensive solutions makes things worse. Greener and cheaper alternatives are not being properly investigated and brought forward.<br>We get plenty of rain in the winter, Southern Water should be developing solutions that store that free natural water for use in the summer.<br>To risk contaminating a reservoir originally conceived to be filled with excess winter spring water by filling the reservoir continually from [redacted] STW will result in very little of this spring water being stored.If there is a contamination emptying the reservoir and decontaminate would probably take a whole summer.<br>There has been a lack of public consultation. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |

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| | | Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP945 | This is to advise you that I wish to object to Southern Water`s plan for an effluent treatment plant at Langstone Harbour.<br>As a qualified industrial chemist who has gained considerable experience with reverse osmosis (R.O.) plants, I am acutely aware of the membranes' susceptibility to damage by many different chemicals which could render them less efficient and could, in turn, introduce pollutants into the water supply. About 16% of the raw sewage arriving at [redacted] is industrial effluent which includes discharges from various plating companies which can include highly toxic cyanides.<br>The discharge from the concentrate line of the R.O. plant will change the nature of Langstone Harbour`s water`s chemical and biological composition which could include pollutants. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We acknowledge your comment that the effluent substrate itself may contain compounds that can damage the R.O. membrane, asset management processes will be designed to take this into account throughout the life of the membrane.<br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. |

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| | There is no independent monitoring proposed as Portsmouth Water will rely on S.Water for analysis and control.<br>The construction of a 40Km. pipe line from the plant to [redacted] will be very expensive and require a high energy loading as it will have to traverse Portsdown Hill behind the plant.<br>Local residents will be concerned regarding their water supply and buy bottled water which will increase plastic waste and require a high carbon footprint.<br>Alternatives:<br>Move the current water extraction plants closer to the tidal limit of the rivers which would protect the upstream water from drought etc.<br>Develop contained underground aquifers to store winter water.<br>Develop new reservoirs<br>Conduct effort to reduce water leakage from pipeworks.<br>I apologise for the length of my email, but it is a serious matter and deserves careful consideration. | All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP946 | With reference to the Havant (Hampshire) "New Water" Scheme.<br>I am totally against this Scheme of mixing Portsmouth Water's New Reservoir (Chalk Stream Water extract) with Southern Water's "Effluent Recycling" water, which is usually dispersed into the sea after treatment, BUT plans are afoot to MIX the two waters for future "New Drinking Water" for this area.<br>There are many reasons why this Scheme is not in the public interest.<br>It is my understanding that:<br>Southern Water are proceeding with this Scheme without fully considering alternatives (Tunnel Vision).<br>However, they do have numerous other possible scheme but have 'parked' them, without consideration until 2029.<br>They are withholding vital information from the public by "blocking access" to information documents.<br>Apparently there will be NO Local Planning Application.<br>The cost of pumping "Effluent Water" from Bedhampton up to Havant Reservoir, mixing water and returning back to Bedhampton for distribution will cost in the region of £3million per year, just for energy to operate this system.<br>The infrastructure cost of laying pipework from Bedhampton to the planned site at [redacted] (South of Winchester) is going to cost at least £1.2billion.<br>It is estimated that the The Site will be "REDUNDANT" within just 60 years!!!!<br>The Reservoir membranes will only last 5 - 8 years then should be replaced which will be costly. Will Southern Water replace them within that time span?<br>Southern Water even plan to 'tanker water' in from Norway, which is none compatible with our water as it is too acid.<br>The "New Water" will taste different.<br>PFAS, PFOS and PFOA are dangerous chemicals. Known as "Forever Chemicals" which are present in many products and are toxic. These are found in "effluent water" and are dangerous. They are banned in many States in the USA with Zero Limit in many States. In the UK the limit in drinking water is around 120 ppb and expected to go lower. There will need to be lots of | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan. |

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| | treatments using Activated Carbon to clean the water to meet the limits. This is extremely expensive.<br>PFAS - Perfluoroalkyl and Polyfluoroalkyl Substances, can cause liver damage, thyroid disease, obesity, fertility issues and cancer.<br>PFOS - Perfluoro-octane Sulfonic Acid, can cause lower birth weights, decrease antibodies in young children and increased cholesterol in adults.<br>PFOA - Perfluorooctanoic Acid, can cause birth defects or other reproductive harm and increase risk of cancer.<br>More research needs to be done on the long term effects to human beings before the public are forced to drink this "New Water".<br>Southern Water Bills are already very high and Southern Water plan to increase the amounts considerably higher. The public deserve a better service from Southern Water than they are currently receiving for their payments.<br>The current plans for this "New Effluent Mix Water" should be stopped and less expensive, safer alternatives explored before proceeding.<br>Thank You. | Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>All of the hormones tested in SWS trials (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater; and for some PPCPs a greater concentration can be found in most natural water systems globally. Even in cases where some compounds were detected, the concentrations recorded were in the order of parts per trillion (except for sucralose and sulfachloropyridazine which were measured in the order of low microgram/litre).<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8. |
| WRMP947 | I am very concerned the Southern Water could be pumping treated effluent into a drinking water reservoir in Havant. We know how they have failed pumping sewage into Chichester Harbour so don't let them do what isn't needed in a reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales. |
| WRMP948 | Fao Secretary of State Steve Reed<br>Consultation re Southern Water's revised Water Resources Management Plan.<br>Introduction.<br>I would like to register my objection to this scheme on the following grounds.<br>Process. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October- |

| Reference | Feedback | Southern Water Response |
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| | The public consultation process has been wholly inadequate. All SW and PW customers will ultimately be affected yet neither company has directly contacted them. Clear information about this costly, complex scheme has not been widely available and there seems to have been no official summary of the environmental consequences or alternative solutions.<br>Sadly I think you would find many locals are wholly unaware of this proposal, of this consultation and of the crucial decision which no longer rests with HBC but with the SoS.<br>The aspect which has received some publicity has been that treated wastewater is to be added to the new spring fed reservoir by a process which although used in other parts of the world has not been used in this country.<br>I greatly fear that those protesting solely on these grounds will be dismissed as luddite so would like to list a few of the other reasons to object which I am sure would have featured more if the details had been widely known<br>Is this the right scheme?<br>We do not need to start expensive processing of wastewater to increase supplies of drinking water for future needs. We are not water poor, PW has never needed to impose a hosepipe ban. We get plenty of rain, and wetter winters are predicted, but we currently store less than 2% of this free water supply. We also currently waste enormous amounts of treated drinking water.<br>There are alternatives<br>Due consideration should be given other ways of increasing supplies for the predicted future population growth and effects of climate change, such as<br>1. developing a full range of storage facilities for excess rainwater including small reservoirs, aquifers, lakes, wetlands, tanks and rain butts closer to demand.<br>2. rolling out a comprehensive leak repair programme. SW currently loses 100million litres per day of purified water which is clearly unacceptable. Reducing this to 50million litres a day by 2030 would alone supply all the extra water SW is planning to provide by reverse osmosis to meet predicted need.<br>3. introducing universal metering to better control consumption and waste,<br>4. advising planners of the need to limit inward migration and new development so that demand for SW's services is limited to what it is possible to supply.<br><br>The Wastewater Recycling Proposal has huge environmental consequences<br>a) Impact on Langstone Harbour/Solent of<br>i) leach from deep drilling into the derelict Broadmarsh industrial waste dump on the shore's edge, where the huge reverse osmosis plant is to be sited and<br>ii)discharge into Langstone Harbour and Solent of the highly concentrated remaining waste products.<br>b) Damage by construction of the enormous pipework system through Havant to HTR and to the [redacted] Pumping Station (40km away).<br>c) Carbon footprint/water quality<br>i) The construction process will be carbon-intensive, and the daily energy and chemical consumption of pumping and processing will be huge.<br>ii) Adding the treated wastewater to the spring water will change the water quality and risk pollution from the inevitable malfunctions. | November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Smart metering underpins our demand management strategy. However, smart metering is primarily a tool for gathering data and information. We recognise that it is the effective use of the information provided by smart meters that will ultimately deliver water efficiency, not the mere installation of smart meters themselves. As part of our smart metering strategy, we will be looking at tools and platforms to maximise the benefits of smart metering. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government. |

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| | Trust.<br>SW is debt ridden and has consistently proved unable to provide adequate wastewater disposal for its existing customers. Chichester/Langston Harbours, and the chalk streams flowing from the Downs are routinely poisoned. It surely cannot be sensible to entrust this company with constructing and managing such a complex and costly scheme.<br>Conclusion<br>For these and many other reasons I urge the SoS to refuse this proposal and call for full and proper public consultation, publication of detailed environmental impact analysis and option appraisal before the matter is reconsidered. | We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier. Issues concerning the numbers of people moving in and out of the region are outside Southern Water's remit.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver |

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| | | our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders They have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021, and this financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment.<br><br>We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans and that when the Competition and Markets Authority (CMA) makes its PR24 determination it will provide sufficient funding for the investment in the 2025-2030 period. |
| WRMP949 | Dear Sir, I wish it to be placed on record my objection to Southern Water's draft WRMP and call on Defra to reject it. My main reasons can be summarised here as follows;<br>1. 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 is within the current climate change context.<br><br>2. The Hampshire effluent recycling scheme at Havant will be required to run 24 hours a day pumping 30Ml/day 40km to [redacted] throughout the year, even in prolonged periods of wet weather when the rivers are full and groundwater is high. This is at a high financial and environmental cost.<br><br>3. SW's WRMP is developed to ensure that effluent recycling projects are prioritised, 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.<br><br>4. 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. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>2. Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>3. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2. |

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| | 5. 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 [redacted] desalination scheme and the WRMP19 back-up option of discharging recycled effluent to the River Itchen were rejected.<br><br>6. 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 absurd selection of this option should be rejected emphatically.<br><br>7. 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 [redacted] to near the tidal limit.<br><br>8. There is insufficient attention being paid to Demand Management. 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.<br><br>9. 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. | 4. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>5. With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>6. Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>7. We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>8. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government.<br>We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify |

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| | These represent merely a number of summarised issues that should provide DEFRA with adequate evidence that the plan is unworkable and should be rejected. I hope that common sense can prevail.<br><br>Yours faithfully | our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier.<br><br>9. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP950 | To whom it may concern,<br><br>I wish to express my deep opposition to the above proposals by Southern Water as totally unfit for purpose on the grounds of colossal financial cost, appalling environmental impacts, disregard for the consideration of ever increasing amounts of rainwater, a dreadful record of Southern Water's management of this precious resource, amongst many other negatives.<br><br>The estimated costs of the project have risen from 500-900 million pounds in June 2023 to 1.3 billion pounds in June 2024. That's just one year. As evinced from other major capital projects this is just the start. Imagine the final bill. It hardly bears thinking about.<br><br>That's not even considering the on-costs of running the system using vast quantities of chemicals and very expensive filtration membranes to end up with a water quality that's a poor substitute for the natural water that we have today.<br>Additionally, pumping water FORTY KILOMETRES to [redacted] every day of the year irrespective of whether sufficient rainfall is evident or not. It's madness!<br>Who will pay? Southern Water's customers initially and doubtless Portsmouth Water's not long after.<br><br>Then of course there's the discharge of concentrated reject waste water from the Boadmarsh WTP through the [redacted] Long Sea Outlet into the Solent and other environmental impacts within the area.<br><br>There are many more cost effective and environmentally suitable alternatives available but it seems the Southern Water want to go ahead with most expensive, environmentally damaging, costly to run scheme that produces the least desirable version of a substance essential to life itself.<br><br>The scheme, as I said in my opening, is totally unfit for purpose and should be soundly rejected. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination. |

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| WRMP951 | I wish to oppose the Southern Water Havant Thicket water retreatment planning application. My reasons are:<br><br>It is the highest cost option and was only selected as it gives Southern Water a huge profit.<br><br>There are many lower cost alternatives which make it obsolete.<br><br>The site chosen is a toxic waste dump and subject to flooding and coastal erosion. | Thank you for reviewing our rdWRMP24 and providing feedback. We note your objection to use recycled water in Havant Thicket.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. Our regulators the EA, NE and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the Gate submission, including the options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP952 | I object to this expensive and unnecessary project.<br><br>Effluent recycling plant constructed on a landfill site that was for decades used by Portsmouth Dockyard to dump their materials from the waste products removed from Naval Ships during refit.<br><br>Similar MOD dumping grounds from the Naval Dockyard in Portsmouth such as Baffins pond and the Hillsea old Marshlands cleansed to enable Lord Nelson School to be constructed upon this sanitised site. | Thank you for reviewing our rdWRMP24and providing feedback.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | Such toxic cleansing operation requires a major financial investment and several years of removal and disposal with the risk of more investment if the site has other very toxic material such as blue asbestos and arsenic and or many other such toxic lagging materials many dockyard laggers and sailors died from lung cancer and other such respiratory terminal illnesses .<br><br>Disturbing this tip and building into these grounds is an ecological disaster waiting to happen and places all who work on such a projects at risk of industrial injuries and adds a massive cost to this project.<br><br>Toxic tip disturbance will be increase project costs and and place Langstone at risks of major Harbour pollution from the toxic waste tunnelling and pile driving will open fissures to allow toxic rain water contaminated by the Toxic dump material into the Harbour to add to the Sewage waste and forever chemicals contained within sewage waste water and potentially the wast material within the dump could also have forever too chemical items contained within it<br><br>All such MOD land fills are not as is being presumed a cheap option, Farlington Fields required years of military shell clearance, shells having been a WW1 storage site.<br><br>I also agree with all the other objection with regard to effluent recycling health risk and question why Southern Water and concealing the fact that their drain of the South Downs Aquifer is i believe the primary reason for the necessity to utilise recycled effluent water alongside all its cost and health risk.<br><br>Aquifer drainage of Ice age water storages deep under ground is being drained across the globe at an alarming rate focussing on their protection and limiting extraction through the plugging of all water supply pipes across the Southern water will more than resolve the need to drink recycled sewage with an even higher likelihood of causing health issues due to the increase concentrations of forever chemicals that enter the sewage system from industrial waste.<br><br>Effective and efficient cost saving through the water network upgrade of Southern Waters Infrastructure.<br><br>Southern water targets to avoid loss of water due to failing pipe distribution system.<br>Save at source of supply not post supply through sewage recycling as is being proposed sort the problem at source:<br><br>• Avoid loss of water by the elimination of a leaky water Network as suggested.<br>• Add to National planning policy the necessity to capture rain water before it enters the sewage system on all new builds based on a building size whereby introduction will create a return cost benefit.. | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP. The options requirement network enhancements in the Central area were not taken forward the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br>We are working on several pilots funded by our water efficiency fund looking at how rainwater |

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| | o All industrial scale building should be water self sufficient utilising rain water for toilets etc.<br>o Introduce Planning Requirement for all new build a water filtration and reprocessing of grey water such as sinks. (Calculate cost benefit analysis to determine size of build that would enjoy a financial return from water recycling systems.<br>o Offer financial incentives and funding for building upgrades for such schemes on existing industrial complexes recycling water from sinks etc and rain water capture system retro fitting as suggested. | capture can be used for both irrigation and toilet flushing. This is an option that can be considered for new builds.<br>Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency. |
| WRMP953 | We totally unhappy with the proposal by Southern Water and Portsmouth Water to make use of recycled sewage water for a number of reasons. Judging Southern Water's track record on sewage discharges, their ability to responsibly process sewage into clear hygienic drinking water must be of primary concern. Southern Water have a near to zero trust record with it's customers. The risks of this proposal is that pathogens and microbial residues in the water are a danger to human health. The siting of a reprocessing plant on the banks of Langstone Harbour are also of major concern due to the water rejection process being discharged into the harbour. By Southern Water's own admission, this will have nearly a four time harmful impact than current sewage discharges. Pumping this scavenged water and sending up to the new reservoir at Rolands Castle is power intensive and yet again is a rush to a solution which should not be needed. Given that only 1% of the natural (unpolluted) rainfall is collected, this ought to be one of first thoughts when looking for for new supplies. With the money being proposed to be spent another priority must be to fix the 190 million litres of water that leaks from the current infrastructure.<br>As residents of Emsworth we currently enjoy the supply of natural spring water from the aquifers beneath the South Downs. To contaminate this water with recycled effluent is an unappetizing prospect, this is a retrograde step we are one we strongly resist.<br>The normal process of consultation has not been followed properly. If it had been you would have been drawing the public along with the proposal and modifying it in line with comments received. You have not done this and therefore have breached your trust with the public and you customers. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. |

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| | | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP955 | Dear Sir<br><br>My husband and I would like to strongly object to the Southern Water proposal to clean recycled effluent which is then turned into drinking water. There are a number of reasons and these are also personal as we live on the Sea Front at Hayling Island and have been continuously disgusted by Southern Waters constant release of effluent into the sea at [redacted]. To use [redacted] to turn wastewater into drinking water is preposterous considering the management of the site over the last 10 years. The cost to consider this, will again fall on the consumers. It is substantial and would not necessarily improve the need to release effluent into the sea. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |

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| | Only recently we were assured that the site at [redacted] was being increased to manage the site better. Is this now being subsumed into the plan or disregarded altogether? Southern Water should be finding ways to capture the rainfall and to make sure it is stored efficiently. There would then be no requirement to recycle effluent to drink.<br><br>We, as residents of Hayling Island, are not happy that our drinking water may be provided as a result of wastewater being turned into drinking water. I have only just found this consultation and given further time would have produced a detailed opposition to the proposal. I am sure there are many more residents that have not been able to respond.<br><br>We would be grateful for a response on the scheme and hope that the decision will be to strongly reject the proposal. We would like to ask that you consider the decision as if you lived in the area that will be affected. | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP956 | I have many concerns about the proposal to recycle water and add it to the new reservoir currently being built at The Thicket in Havant. I am a resident living in the East Hampshire area of Havant & Waterlooville. When the proposal for the reservoir was set out initially it seemed to be a brilliant idea and we were sold a wonderful vision of a spring filled water facility with great attention to the preservation of wildlife and habitats by Portsmouth Water, it looked good - then Southern Water crept in on the bandwagon and everything changed. I don't trust SW one inch, they make little effort as far as I can see to conserve water and this idea of recycled water, if granted will in my view give them carte blanche to carry on regardless - they won't have to make efforts to conserve it they can just use recycled water!<br><br>The water in this area is special and tastes like no other water and I personally don't wish that to change. I am concerned that people will not trust their water and buy bottled water with all the environmental issues that that entails<br><br>We do get a lot of rain in this area , but there are no efforts to store it which could begin with a very simple and fairly cheap partial solution of giving each household a water butt in which rainwater can be stored for thigs such as watering gardens, more efforts to conserve the water that falls here are needed overall.<br><br>Langstone Harbour is a site of special scientific interest and the proposed recycling plant in the area would jeopardise this. I am concerned that the release of reject water into the Solent will be even more concentrated than the sewage which has been being released in recent years, this will surely have an adverse effect on the water quality and wildlife, people have reported falling ill after swimming and surfing in the area, this will not get any better if more dangerous discharges are allowed. NO discharges should be made into the Solent in my opinion.<br><br>I understand that this solution is not even cost effective (who'd believe that SW was going for something that's very expensive!) and from what I understand effluent recycling plants will be redundant in 60yrs. Doesn't seem to me to be a very prudent use of our money! | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir. A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10–20 years of the electrical and mechanical plant.<br>Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | Southern Water lose 100 litres of water EVERY DAY to leaks! Perhaps they need to fix the leaks instead of chasing incredibly expensive ideas like recycled effluent?<br><br>This is my response as a concerned resident.<br><br>Yours sincerely | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP957 | Dear Sirs,<br><br>Only yesterday I became aware of this revised proposal and I am appalled. There has been no publicity about this proposal to consumers in the area particularly Portsmouth Water consumers who will be adversely affected and should be properly consulted.<br><br>I had heard about Southern Water's original proposal to hijack Portsmouth Water's new spring water reservoir at Havant thicket and pump recycled water into it and understood the proposal had failed local planning permission on grounds of a raft of public objections to the potential contamination of this natural spring water facility and that the original planning permission for construction of the reservoir was on environmental habitat grounds was granted only for filling from natural water supplies of which there are plenty.<br><br>This proposal to build a new type of treatment works to recycle effluent to potable water, but compositionally different, from spring water and store it in this reservoir for onward pumping to [redacted] area ( 30+miles away) is ridiculous and will reduce the quality and taste of the water supplied in the area to Portsmouth Water consumers and permanently change the water environment in the reservoir.<br><br>( I am not in a position to comment on the suitability of other proposed sites for building such facilities in the Solent area but I do not believe these involve storage in spring water reservoirs.)<br><br>This new type of water recycling facility is proposed to be built on reclaimed landfill site on the edge of the harbour. Just the building of this facility with the need to pile drive and dig to put in underground pipework will risk extended methane leakage and pollution leakage into the harbour environment. Any failure or leakages would pollute this fragile environment., which is currently clean enough to restore the oyster beds. The risks are too high. Especially as Southern Waters record of pollution leakages and dumping is already high and casts serious doubts of their ability to manage such a facility. Also the complexities of using such a location are likely to throw up issues which will delay the build and make it unlikely to come on line in the proposed time frame. A further issue is what is proposed to happen to the waste product which does not pass the filters into the potable side. Will it need further treatment at the sewage farm? Will it be clean enough to pump out into the harbour where excessive effluent discharges are already causing problems? Will it be pumped out via the Eastney outfall into the Solent? Either solution risks more untreated effluent discharges which are already at illegal levels and cause failures in bathing water standards as well as potential contamination of oyster beds. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for |

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| | I understand this facility is suggested as a drought supply management. However I understand it will need to be run 24hours a day every day to maintain the cleanliness of the pipework and filters (except of course when cleaning and changing the filters). I understand running such facilities are expensive high energy users, not ideal at a time when we are trying to minimise or reduce energy usage. Especially for a facility with a projected shelf life of only 60 years. This is an expensive solution which seems to be designed for a different problem than the one which exists. The money could be better spent on long term sustainable solutions.<br><br>There does not seem to have been any realistic assessment of more environmentally sustainable and cheaper alternatives which also could have a longer shelf life. Just accelerating their current slow proposals for reduction in leakages (currently at around 19%) bearing in mind consumers would be paying for expensive potable water production for it only to leak away, would be a sustainable start. As well as looking at more reservoirs or aquifer storage of existing rainfall preferably near where the water will be needed, to supply their customers (i.e not contaminating Portsmouth Water customers water supplies). Water extraction near where rivers meet the sea rather than upstream would also seem to be sustainable and help sustain the fragile chalk stream environment.<br><br>I also understand a new western water “grid” is under construction and when it comes on line will relieve some of the water issues in the western Southern Water supply area. This does not seem to have been sufficiently taken into consideration.<br><br>If I has had more time I am sure I could have come up with a more coherently argued objection. I hope others have had more time to do this. | water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding concerns about the discharge of waste from the proposed water recycling plants, the scheme will include monitoring equipment to assess the quality of any discharges. As with all discharges, the Environment Agency will determine the permits. These permits will help protect the environment and the Environment Agency will monitor compliance of all discharges.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on |

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| | | the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP. |
| WRMP960 | I have major concerns thr proposals for the following reason<br><br>I do not trust southern waters management of our water supplies and thir environmental approaches.<br><br>They cannot be trusted to stop spillages and leaks that impact on the environment so I have no trust in them to recycle water safety. On their current performance we are headed for a major health risk if they are allowed to recycle water with the same lapse approach.<br><br>They need to tidy up their act by improving their current record before using other options to cover their failings.<br><br>They need to exhaust other alternatives to water shortages like capturing more of the rain water than they currently do before subjecting us to recycled water and their other draft plans<br><br>They need to become a company that can be trusted to meet their responsibilities and accept their failings, implementation and achievable action plan for improvement and stick to. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We note your objection to the use of recycled water in Havant Thicket. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. All drinking water sources will be subject to the same stringent quality checks and requirements as enforced by the Drinking Water Inspectorate (DWI), the independent regulator of drinking water in England and Wales.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Although, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. |
| WRMP961 | I am writing to voice my objection to Southern Water's Water Resources Management Plan specifically the Recycling Plant and effluent water into the Havant Thicket Reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | I feel that this has been put forward as the best plan for Southern Water and its profits, not for the environment, public health or financial situation of customers.<br><br>Defra must reject the plan and require Southern Water to develop a more sustainable plan that works with climate change & which puts the environment before profit.<br><br>I also understand that this has been put forward direct to the Secretary of State and not through Local Planning Authority, so again Southern Water can profit on the construction and running of this plan, so as to increase the profits of Southern Water without consideration of the aforementioned affected outcomes. There are no alternatives suggested in their plan and any other options have not been investigated fully to give an open minded and transparent assessment of the best path forward.<br><br>The persons in charge of Southern Water are some of the same that were in charge of the now financially ruined Thames Water, which should initially ring alarm bells with anyone reading the plan as to their intentions, integrity and goals for the future – their profits and shareholders.<br><br>The information missing from this plan is astonishing and it is very narrow minded of your approach to just accept the information you have been given – more varied and statistically correct reporting (rather than vague percentages on usage and weather), alternatives for the Recyling Effluent Plant, the environmental, financial and public health impact for years to come.<br><br>I am astounded that you are failing to see or even bother to accept that this does not need a more thorough and deep investigation. Surely this plan should produce more questions than answers, does it not make you think as to what they have omitted to bring to your attention and why?<br><br>I was made aware of this plan and have made it my business to find out more information and its alternatives. I have also heard information from people more well informed, on the ecological impacts this plan will bring and the investigations that should be done, into alternative solutions and their impact. I think you should have this approach, so as to make a more open minded decision and be transparent.<br><br>This decision should not be taken lightly as it will affect the whole country, future plans from other water authorities will flood in if this is whisked through without deeper investigation and questions asked.<br><br>I think you need to pause, take a step back and obtain information on costs and impacts of alternative solutions to this problem, including environmental and financial impacts for the south. Also why have Southern Water left these out? More importantly ask yourself, if you would drink from the tap after this was done in your area?<br><br>There are many more questions to be asked and investigated before you pass this plan. Please ensure you have all of the information on all solutions before a final decision is made, it will | Southern Water has planned to build the Effluent Recycling Plant on landfill and risks are unacceptably high. If despite all of the concerns about whether effluent recycling is needed, the significant environmental impacts, enormous costs to build & operate are to be ignored, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don’t expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2. |

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| | have ramifications for years to come on many, many people, their surrounding environment and their health. Think carefully about your choices and ask if they have been well informed and transparent.<br><br>To assist I have made a list of concerns/omissions on Southern Water Plan:<br><br>· Southern Water has a plan that is not planning for the future and the environment. By planning a £1.2 billion scheme to recycle treated waste water into Havant Thicket Reservoir, along with 3 other recycling schemes, Southern Water are taking us down the wrong path. We need a plan that focuses on developing more sustainable solutions first, that work with climate change, to collect the forecast increase in winter rainfall and store it in new reservoirs and confined aquifers for use in dry summers. We get plenty of free rain but only collect 1% of rainfall in the UK. Collecting and storing more water in winter would also provide multiple benefits to society, helping to reduce the forecast increase in flooding, provide recreational sites for our communities, and provide biodiversity opportunities if we build more reservoirs.<br><br>· Southern Water must have a programme of action to reduce leakage. 3% of water Southern Water take from the environment is lost before it even reaches the treatment works, then a further 19% of water that customers have paid to treat, is currently lost to leakage in the distribution network. That is more than 100 million litres of precious water lost every day. Southern Water must be required to deliver a much faster programme of renewing water mains to replace their ageing pipe network, or they will never get leakage under control. Having a replacement rate of just 1 in 1000 years when a water main is only designed to last 120 years is just unacceptable.<br><br>· Southern Water cannot be trusted to operate their current obligations without causing pollution and investment. How can we trust Southern Water with the complex technology required to treat final sewage effluent, which has not been used for this purpose before in the UK? Southern Water have a very poor track record of treatment plant and pumping station failures, many prosecutions for pollution incidents and failure to take prompt action to rectify problems. The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable. Also this will cause the public to switch to bottled water for drinking, therefore increasing single use plastic consumption and pollution.<br><br>· Southern Water need to do more to protect the environment and keep their promise of Carbon Neutral by 2030.Our river catchments could be protected quickly if they moved river abstractions closer to the tidal limit, abstraction boreholes down the catchment. This would reduce the priority for abstraction reform, which is driving the need for effluent recycling. Storage options need to be developed closer to where the water is needed, so that long pipelines that damage our countryside and wildlife are not required. Options need to be developed that do not have such a high carbon and emissions footprint. We need a strategy that prioritises low energy solutions, the energy alone for the Hampshire scheme will cost more than £3 million/year. With pumping and treatment needed 365 days a year, even though effluent recycling was selected as a drought resource, this will financially be passed to customers. In a | Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29. We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

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| | time of climate emergency how can you select the schemes with the highest carbon footprint and emissions?<br><br>Examples :<br>The Hampshire and Littlehampton effluent recycling schemes have the highest negative environmental impact score of any of the options considered.<br>The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by sea tankers.<br><br>· Southern Water has planned to build the Effluent Recycling Plant on landfill and risks are unacceptably high. If despite all of the concerns about whether effluent recycling is needed, the significant environmental impacts, enormous costs to build & operate are to be ignored, they must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br><br>Other points to bring to your attention are as follows<br><br>· Defra need to change the water industry funding mechanism to stop incentivising infrastructure heavy solutions, but instead encourage development of sustainable solutions that work with climate change.<br><br>· There has been inadequate publicity and consultation about Southern Water's plan. They did not ensure all of their customers were informed of plan and consultation. They should have written to all Southern Water & Portsmouth Customers across the region that will be impacted by this major change to their water supply.<br><br>· The level of detail contained within the 32 volumes of publicly available information, provided by Southern Water is hard to digest without the significant investment in time which many readers are unable to spare. The action withholding 12 volumes from public view does not help, as that is where the useful detail on options and environmental assessments is to be found. Therefore, Southern Water have made it difficult for customers to investigate and make an informed decision.<br><br>· The huge cost of servicing the massive debt created by the selection of such an expensive option will also have to be paid for by customers.<br><br>· Research shows that customers prefer more natural & sustainable solutions such as reservoirs and aquifer storage, but Southern Water have not listened.<br><br>· The Hampshire effluent recycling scheme alone will deliver a profit of about £45 million pounds to Southern Water, this kind of profiteering paid for by customers is not acceptable. | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/ |

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| | I could go on and do have more information I have obtained, should you wish to discuss in more detail. I hope you will give my objection due consideration and have read and understood my points clearly and fully. | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Sea tankering from Norway is no longer included in our plan. |
| WRMP962 | As someone who lives very close to the proposed reservoir I am very concerned about the plans for this new reservoir. The original plans seemed to be fairly reasonable and were therefore granted planning permission. Now, the plans have been totally changed to include many alarming aspects.<br><br>Apparently the construction is to be very 'carbon heavy' and therefore irreversibly damaging to the environment. It will be incredibly expensive. I certainly don't relish drinking recycled effluent as opposed to fresh drinking water from the many springs and aquifers in this area. I am also worried about unpleasant or chemical smells resulting from this new scheme.<br><br>I understand that the new proposal is quite unnecessary and there are several alternatives, each of which would be less costly, less harmful and quicker to implement.<br><br>I do hope you will take note of all our concerns about this scheme. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket |

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| | | reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |
| WRMP963 | I wish to object most strongly to the proposed Southern Water water resources plan which is currently being advocated by Southern Water, especially the use of recycling effluent from the [redacted] Treatment Centre to the newly created Havant Thicket Reservoir.<br><br>I understand this is being planned in part to reduce abstraction from two rivers, the Test and Itchen to satisfy the water needs of Southampton and surrounding areas. This could easily be rectified by changing the abstraction sites on both rivers to much nearer the coast. No extensive, costly pipelines and associated works required. Simple.<br><br>I am also concerned that the recycled effluent will be mixed with virgin springwater supplying the water in the new reservoir at Havant Thicket from the natural springs nearby. The reservoir was initially created to ensure pure water for Portsmouth and its surrounds for future years. Portsmouth Water used to be proud of their record of providing excellent pure water. The impact of mixing pure spring with this treated effluent water is unknown, untested. That is very scary.<br><br>What is known is that Southern Water has a leakage rate of 19%, polluting rivers and the coast. They often disvharge raw sewage into Langstone Harbour and surrounds. How can we trust SW to deliver successfully treated effluent when they have obvious disregard to polluting our rivers and coasts?<br><br>I entreat you to examine the sustainable alternatives to this plan proposed by many learned experts than myself.<br><br>Southern Water cannot keep putting profit over water quality, which is such a precious resource. Effluent recycling is not the answer. Please listen to us ordinary people. Thank you DEFRA. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household |

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| | | and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP965 | Dear Sir<br><br>I wish to strongly reject Southern Water's leaky recycling plan for local drinking water.<br><br>Southern Water needs to develop a more sustainable plan that puts local people and the environment before profit.<br><br>Only 1% of rain water is collected - this needs to change. We need to collect more rainwater rather than recycle affluent water.<br><br>19% of water is lost due to leaking pipes - disgraceful. Again Southern Water needs to use there profit to reinvest in their pipework rather than paying out huge dividends.<br><br>Southern Water passed performance has been criminal and I can't believe that they can be trusted not to cut corners when treating affluent water. The alway put profit first before looking after us and the environment.<br><br>The carbon footprint of these solutions are extremely poor<br><br>I'm not convinced Southern Water knows about this plan.<br><br>Please reject this plan.<br><br>Kind regards | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | | this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP966 | I object to this plan as it will be very detrimental to Havant and the surrounding area in terms of the impact on the environment.<br><br>Southern Water's performance has been abysmal for years and therefore how can anyone have any confidence in their ability to deliver this plan successfully.<br><br>As a result there is a significant risk that delivery of the plan will make the problem of sewage discharge worse. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We note the objection to the use of recycled water in Havant Thicket. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP967 | I believe that this plan should be rejected due to Southern Waters poor record in regard to its current network and control of sewage outages into the Solent .<br>Also I do not agree with using recycled waste water in our water supply especially as this would be the first process of its type in the UK . | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver |

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| | Regards | our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP968 | Team,<br><br>I am writing to urge you to prevent Southern Water developing an environmentally unsustainable plan for generating fresh water from effluent. If we lived in a drought prone country then this may be appropriate but for the UK this is an extremely expensive and environmentally destructive solution. Southern Water has done nothing to build trust with the local or wider community and so we are distrustful of the project and it being successful in its objectives.<br><br>I object specifically as follows<br>1) the huge energy costs and carbon footprint involved in construction and working of the plant.<br>2) destruction of an open site adjacent to a highly protected SSRI.<br>3) negative impact on the visual environment at Broadmarsh.<br>4) the input of recycled effluent water into the Havant thicket reservoir compromises biodiversity and undermines the arguments made for the “clean” spring fed reservoir in the initial planning consent.<br>5) plenty of other alternatives are available and these are likely to be greener and less expensive e.g. a focus on abstracting further downstream and reducing current massive leakage (100 million litres/day).<br>6) the plan will fuel the use of bottled water due to mis-trust in recycled effluent.<br>7) inadequate public consultation with very limited awareness of the impact on the local communities who will me most affected.<br>8) the plan does nothing to reduce raw sewage discharge into Langstone Harbour and diverts the companies focus away from what should be it’s number one priority<br>9) discharge implications of concentrated effluent into the Solent<br>10) the danger of landfill leachate contamination of Langstone Harbour caused by mechanical boring through former landfill - only a very limited survey has so far been conducted.<br><br>In summary, on a rain drenched island there must be more environmentally friendly solutions available to save our chalk streams. This scheme represents the worst of all worlds.<br><br>Sincerely | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Our supply area is classed as being under ‘serious water stress’ by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br>2. As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the Environmental Assessments for the WRMP. Work is being undertaken by our consultants WSP to address these comments and make any necessary changes to ensure that the assessments align with regulatory requirements.<br>3. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br>4. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br>5. We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | | 6. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br>7. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them.<br>In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A.<br>We released a press release regarding the consultation, which was picked up by major newspapers; *The Guardian* and the *Financial Times*. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers.<br>MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br>8. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br>9. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>10. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. |
| WRMP969 | Dear Sir/Madam. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | I wish you to register my objection to your plans to use the Havant Thicket Reservoir for recycling effluent rather than collecting raw water only. I live in Emsworth next to the River Ems and I have seen the results of over extraction of the ground waters so I recognise the need for additional raw water sources. To effectively hijack the HTR for a purpose for which no planning permission was received is both illegal and arrogant and will leave residents with a water source which will be recycled effluent.<br>If you apply for revised planning permission in order to change the use of HTR from the intended use to a holding reservoir of efflent then you will not be thanked by the tax payer who has partly funded this new reservoir and the residents of Hampshire and West Sussex.<br>Additionally you will have to cope with the likely objections to the High Court which will follow.<br>Regards | Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. We note the objection to the use of recycled water in Havant Thicket. |
| WRMP970 | I do not wish to drink recycled sewage | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements.<br><br>The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. |
| WRMP971 | As is the case with Thames Water and others, the lack of proper investment in repairing existing infrastructure undermines any case for so-called improvement schemes such as this. Make the best of the existing infrastructure before considering plans for expansion.<br>Additionally, carbon management issues should really receive higher priority than seems to be case here.<br>Best, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term |

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| | | decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP972 | Dear Sirs<br><br>I am deeply saddened to discover Southern Water"s latest plan.<br><br>The proposal from the firm to operate a very complex, costly effluent recycling scheme is farcical.<br><br>It has to date been unable to operate conventional treatment plants and pumping stations without causing severe pollution, leading to numerous prosecutions for these failures and still not taken sufficient action to remedy them.<br><br>It now plans to construct an effluent recycling plant on a contaminated landfill site adjacent to Langstone Harbour. I understand this will need large tunnel shafts and hundreds of piles reaching down to the chalk aquifer below. The risk of pollution into Langstone Harbour appears to be far greater than the existing simpler treatment plants, which already are allowed by Southern Water to badly pollute this harbour.<br><br>The prospect of allowing Southern Water to make large profits from building the infrastructure for this project is inconceivable, especially when the cost is already projected to be well over a billion pounds and when they have been previously fined for significant failings in their existing comparatively straightforward treatment plants.<br><br>We will obviously have far greater needs for drinking water in the future. However before embarking on this financially and environmentally costly plan, perhaps simpler, but potentially more effective plans should be considered.<br>Climate change is producing more, not less rain. It needs to be captured, but at present only 1% of rainfall is collected. However at present 3% of water captured by Southern Water is lost before treatment. A further staggering 19% of the costly treated water is currently lost before it reaches a customer due to leakage. This equates to one hundred million litres a day lost.<br><br>A fraction of the projected new Southern Water recycling plan cost would go a very long way to improve the ageing pipe network and distribute the valuable water to the consumer. All the while | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This |

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| | reducing the massive environmental damage caused by the projected 40 kilometres of pipework, numerous pumping stations plus the already mentioned recycling plants, together with the daily energy used in pumping large quantities of water over large distances.<br><br>I implore you to throw out this ill conceived plan and force Southern Waterloo develop a more sustainable plan which for once puts people before profit.<br><br>Yours sincerely | would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. |
| WRMP973 | Dear Sir/Madam<br><br>Although the science of effluent recycling may be sound Southern Water simply cannot be trusted to execute it responsibly. With Southern Water's poor track record of treatment plant and pumping station failures, prosecutions for pollution incidents and failure to take prompt action to | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | rectify problems, how can we trust Southern Water to operate and maintain this complex advanced treatment process?<br><br>This plan is even more environmentally damaging than Southern Water's existing habit of pumping raw sewage into the coast. The reject water from the effluent recycling plant discharged into the Solent will be 4 times more concentrated than the existing sewage effluent discharged. A Southern Water report confirmed it will likely have a significant effect.<br><br>The Broadmarsh site is utterly unsuited to development. Significant risk to Langstone Harbour of developing the effluent recycling plant and deep tunnel shafts needed on the contaminated landfill site at Broadmarsh (Site 72). There are alternative safer and more suitable sites for the plant which avoid unacceptable environmental risk to the harbour.<br><br>Of all the plans put forward to ensure that Southern Water customers have a supply of clean water recycling centre is more costly, and less reliable than other plans that were considered. It appears that the plan is put forward only so that Southern Water can borrow money, get customers to pay for the loan, and extract the cash injection for shareholders. This is unsustainable and completely dishonest. This must not be permitted.<br><br>Thanks | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company’s history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |
| WRMP974 | I object to your plan | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |

| Reference | Feedback | Southern Water Response |
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| WRMP975 | I wish to make my objection to SW's plan to pump treated waste water into the Havant Thicket reservoir.<br>The company has shown a total disrespect for our environment and this plan is yet another attempt to plaster over the cracks of years of under investment and bad management with a plan that suits them but not the customers and environment they serve. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>We note the objection to the use of recycled water in Havant Thicket. |
| WRMP976 | We are very concerned to read that Southern Water are planning to build a sewage water treatment plant at Bedhampton that will produce 'drinking quality' water to be pumped into the new Havant Thicket reservoir and mixed with fresh water collected by Portsmouth Water Company. As Portsmouth Water customers this mixture will be piped to our home which until now has always been provided with fresh spring water. I was under the impression that planning permission for the reservoir required it to be filled from spring water.<br><br>Given Southern Water's abysmal record of repeated illegal sewage contamination of Chichester Harbour, how can we trust them to maintain the purity of their output from this plant? We understand that the proposed treatment process is new to the UK and as such must be considered risky.<br><br>A further objection is the high energy requirement of the plant at a time when the world needs to reduce reliance on, and consumption of fossil fuels.<br><br>We would much rather see the money needed for this expensive project going instead towards water infrastructure maintenance and replacement to reduce the shocking waste of water that occurs because of leaks.<br><br>We were not aware of the proposal by Southern Water until a few days ago and find it very suspicious that they have not informed the people that would be affected by the change in water quality. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. |

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| | We strongly object to this scheme and call on DEFRA to refuse permission. | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; *The Guardian* and the *Financial Times*. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP977 | Dear DEFRA.<br><br>To save you reading more or less the same objections may I say I completely agree with and endorse the comments of Me Dave Childs of Havant Thicket Nature Campaign.<br><br>For all the reasons he states I am equally opposed to this plan.<br><br>I request that Southern Water fix their leaks, stop suggesting this is a great idea and adopt a less harmful plan of smaller reservoirs.<br><br>Yours faithfully, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We |

| Reference | Feedback | Southern Water Response |
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| | | have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP978 | I am writing to express my concerns in relation to your plans to put treated water into Havant thicket reservoir. This scheme is short sighted and not a sustainable solution. Surely it would make much more sense for this reservoir to be collecting fresh rainwater. Currently we only collect 1% if rainwater in the UK.<br>I am very concerned about the southern waters ability to protect our waters from sewage pollution and envisage this week be made much worse by these plans.<br>Southern water need to be much more ambitious if they are to honor their commitment to be carbon neutral by 2030. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net |

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| | | Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |
| WRMP979 | Dear Secretary of State (Defra),<br>I am writing to strongly object to Southern Waters plans to recycle waste water into Havant Thicket Reservoir.<br><br>The proposed investment could be much better spent on alternative water infrastructure, such as reducing leaks and increasing rainwater collection and storage.<br><br>Southern Water's mismanagement of the infrastructure that we all rely on is already a significant cause of distress for me and my family. I grew up on Hayling Island and spent much of my time in, on and around the water. Never did I have to worry about sewage pollution in our seas. After a short time in London, my wife and I returned to start our family in our home in Emsworth. We now find that our young children are unable to enjoy the sea due to Southern Water's inability to manage storm water overflows, resulting in raw sewage being regularly pumped into the sea around Chichester and Langstone Harbour.<br><br>The idea of allowing Southern Water to potentially mismanage the recycling of that same sewage into our drinking water supply, with this absurd project, is totally unthinkable and unforgivable for me and for the future of my children.<br><br>Please refuse these proposals and enforce a solution to our future drinking and waste water concerns that solves the real underlying issues in a sustainable way, a taking better advantage of the options at our disposal.<br><br>Best regards, | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP980 | TO WHOM IT MAY CONCERN<br><br>I write to object to Southern Water’s proposal to mix recycled sewage with drinking water in the new Havant Thicket Reservoir.<br><br>It is incumbent on the Water Company to find an environmentally sustainable and cheaper way of providing the local community with pure drinking water – or, if selling it elsewhere, the community/ies elsewhere. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from |

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| | The heaps of human waste which are spread over arable land are already a health hazard, given that most of the population is taking chemical medication of one sort or another, e.g. contraceptive pills, heart disease pills, etc. etc. Organic foodstuffs are thought to be free of chemical contamination, and are increasingly bought. Human sewage however “purified” must be kept out of our drinking water. | 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP981 | Dear Sir/Madam<br><br>I would like to object most strongly to this Water Resources Management plan.<br><br>I do not agree with Southern Water's proposal to add their recycled sewage to what would be naturally clean water in the new Havant Thicket reservoir; I do not consider the resulting product would be fit for purpose.<br><br>I am a regular sea swimmer at Eastney beach, overlooking The Solent near their [redacted] sewage works. Last March, despite carefully checking their supposedly up-to-date app informing us of recent discharges, I was a victim of their misinformation and caught a serious bacterial infection from sewage-infested seawater, resulting in my hospitalisation and being treated for cellulitis and sepsis and suspected hepatitis.<br><br>I feel that if Southern Water cannot be trusted to conduct their sewage treatment operations and notications safely, I do not want them to have any input regarding the cleanliness of my drinking water. This is at present supplied to my taps perfectly cleanly by Portsmouth Water!<br><br>I also wonder how long it would be before the first 'technical issue' gives them the excuse to dump untreated water into Havant Thicket reservoir!<br><br>Yours faithfully, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. |
| WRMP982 | I wholeheartedly reject the idea of managing the water in this way.<br>Already our local waters have an unacceptable amount of waste in them, accidental I do not believe for one second. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Our regulators the EA, NE and Ofwat are independent from Southern Water and they undertake an analysis of our plan. Their analysis looks at all aspects of the plan, including the |

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| | I absolutely insist that we have fresh water in this new resource. There have been many studies to prove that these plans are not fit for purpose and similar facilities around the world have failed in the implication of the same.<br>The profits from services we have already paid for surely allows for us to have the water we deserve. | options and risks. Our SoR shows the feedback we received from these regulators and how we have responded to it.<br><br>The options and risks are assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process.<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP983 | Dear sirs,<br><br>I wrote with concern about your current draft plan. Please can you advise why priority is not being made to capturing rain water and minimising leakage throughout your network, both of which would ensure sufficient natural water to be provided within your network, rather than effluent recycling, which appears to be the easy way out, whilst providing minimal quality to your customers.<br><br>I hope that you will revise your draft plan further in light of the above. | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We note your point on rainwater storage and our plan does include constructing two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth nothing that reservoirs do require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire and to create a sustainable source of supply. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement |

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| | | programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP984 | Dear DEFRA,<br><br>I have significant concerns regarding southern waters (sw) plans and ask in the strongest possible way that permission is not granted for them in there current form.<br><br>Sw plans are not ambitious enough and I believe carry a high risk of failure.<br><br>SW are not repairing water leaks fast enough<br><br>SW current plan is not environmentally friendly and will produce significant waste whilst failing to harness rain fall.<br><br>Please reject SW plans and ensure an ambitious environmental sustainable plan is agreed in its plan. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>As a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website<br><br>https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/ |

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| | | We thank you for your engagement and feedback with our rdWRMP24 consultation. Your comment has been noted. Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP985 | Southern Water Revised Draft Water Resource Management Plan 2024<br>Dear Defra,<br>My understanding is that a Water Resource Management Plan should be a strategic plan that seeks to address both local and regional issues of water distribution and supply, whilst meeting environmental standards and climate challenges. I do not believe that this Southern Water draft WRMP fulfils these criteria.<br>Southern Water appears to have tunnel vision with regard to effluent recycling. Even now with this revised plan it continues to promote effluent recycling as its preferred option. What assessment system have they employed to arrive at this decision? Surely it must be flawed and needs close scrutiny. The proposed scheme is inherently expensive. It is inherently energy demanding (excessively so). It is inherently bad for the environment, exacerbated in this case by the close proximity of the Waste Water Recycling Plant to harbours of international importance for biodiversity. Furthermore, it is not sustainable in relation to climate change, emissions, or infrastructure longevity.<br>Yes, effluent recycling is used in other parts of the world where there are no other viable options. Expensive though it is, it can work, but the advanced technologies involved must be properly maintained. Southern Water has a poor track record of plant maintenance, with multiple failures in recent years. I have serious concerns about the risk of contamination of the Havant Thicket Winter Storage Reservoir and south coast harbours resulting from procedural failures or inadequate maintenance schedules because asset stripping has resulted in a worrying lack of operational resilience within the company.<br>Here in the UK effluent recycling simply isn't necessary. We are not drought stricken, we have plenty of rain, even in the south. Water companies (and society as a whole) just fail to capture enough of it. They must do better. Of course, in addition to too little water capture, there is a well-publicised and significant waste of water. Southern Water loses 19% of its water during customer distribution. Hardly surprising when the company works to a mains replacement rate of 1000 years!! It is not good enough. Even quadrupling the current mains replacement rate will still fall woefully short of accepted industry standards.<br>Furthermore, Southern Water's lack of consultation with its customers regarding their plans for effluent recycling has been nothing short of abysmal. There have been ample opportunities for the company to inform customers of their plans when sending out invoices and other communications, but there has been nothing. Given that this would be a fundamental change to the supply of water there should have been a public awareness campaign. In fact, quite the reverse is true, and Southern Water appears to have tried very hard to mis-inform and hide information throughout the process.<br>Specific Issues<br>Siting of the Waste Water Recycling Plant (WWRP)<br>Southern Water's intended location for the WWRP plant is at Broadmarsh, a former landfill site close to the shore of Langstone Harbour Ramsar/SPA/SAC/SSSI. Construction of the plant will require hundreds of pilings and shafts to be sunk into and through the landfill and into an | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October–November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35–40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; *The Guardian* and the *Financial Times*. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | aquifer. This has significant potential to lead to contamination of the aquifer and the adjacent SPA/Ramsar sites in the harbours through leaching of landfill materials. In addition, it is deeply concerning that the wastewater from the plant will be pumped out into the Solent risking further environmental damage to these sensitive sites. Engineering solutions to overcome these issues will be unnecessarily complex and costly. If nothing else, the WWRP should be moved to an alternative, less damaging location nearby, or to [redacted] WTW.<br>Detrimental Effects on Havant Thicket Winter Storage Reservoir<br>Havant Thicket WSR was originally a very sustainable solution to help address the need for water in this region. The first new reservoir in the region for many years. I fully supported it. It will be the first chalk spring-fed reservoir in the world. Southern Water now wish to top up the spring water with recycled effluent. Yes, it will be treated, but not all the chemicals will be removed it is still effluent based with all the inherent dangers that poses (hormones, pharmaceuticals etc). It is deeply concerning that reservoir will be used in this way. The recycled water pumped in from the WWRP will be much more saline and have a significantly different geochemical composition to the spring water in the reservoir and as such has the potential to be very detrimental to the biodiversity of the new wetland that is to be created as an integral part of the reservoir project. I do not believe there has been appropriate modelling to determine the effects of the recycled water on the biodiversity since this scheme was proposed. The mixed recycled water from the reservoir will also change the taste of the final drinking water product which, though potable, may prove unpalatable to customers. This would then lead to an increased uptake of bottled water – something which is common in other parts of the world where effluent recycling operates – with all the negative environmental impacts associated with production and disposal of plastic waste.<br>Changes to OFWAT Funding Mechanism<br>It is very difficult to understand how Southern Water has arrived at its preferred options for this draft WRMP. Somehow effluent recycling comes top of the list, with tankering water in from Norway as the back-up plan. Water from Norway! This is ridiculous. It is a fanciful option, akin to bringing icebergs from the Arctic. How do these options make it to the top of the list? Both options are incredibly carbon-hungry and as far from sustainable as it is possible to get. Unbelievably, effluent recycling actually has a worse carbon footprint than using tankers because, in order to maintain the process, it has to run 365 days a year, including for large parts of the year when the water is not even needed.<br>This effluent recycling scheme requires a vast amount of expensive new infrastructure, and one wonders if this is why Southern Water has chosen this scheme. Not because it makes sense, or is best for its customers, but because it extracts the biggest profit from the current OFWAT funding mechanism.<br>Of course, there must be investment in the water industry and companies need to make profits, but Defra must ensure that the funding mechanism is changed so that projects which deliver sustainable, climate-friendly, customer-focused projects are prioritised. There has been far too much asset stripping of water companies in recent decades and a serious lack of investment in maintaining and upgrading existing infrastructure.<br>Protecting the Chalk Rivers | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. |

| Reference | Feedback | Southern Water Response |
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| | One of the main drivers for Southern Water is its need to minimise pollution incidents and reduce water abstraction from rivers, especially the chalk streams like the Test and Itchen. It has rightly been fined by the Environment Agency on a number of occasions.<br>Southern Water says that effluent recycling is required to achieve this, thereby protecting the rivers. There are however other options available, which the company is aware of, but which it refuses to bring on-line at this time. These options which include moving abstraction points downstream to weirs closer to tidal limits and creating new winter water storage facilities in confined aquifers, would be easier to implement, cheaper for customers, less damaging to the environment, require less new infrastructure and would deliver broader biodiversity benefits to the catchments.<br>WRMPs are, I believe, intended to encourage water companies to develop regional distribution networks to share water across catchment and company boundaries for greater sector resilience. With Southern Water's network now connected to the Portsmouth Water network, sites for aquifer storage or new reservoirs could be developed anywhere in Hampshire or West Sussex and shared.<br>Temporary Use Bans<br>I would ask that Defra looks at so-called "Hosepipe Bans." Too much is made in the media and by successive governments of these temporary water restrictions. In a country with fluctuating rainfall now further compounded by climate change, there will be times when water is less available. Hosepipe bans are useful way to remind people to be careful with water and to value it, rather than taking it for granted. Occasional bans should be an acceptable part of life as long as they are fully justified and are for the right reasons.<br><br>In summary, I ask that Defra rejects Southern Water's submission for effluent recycling. It is not in customers' best interests, it is certainly not good for the environment, it is overly expensive, and it is not necessary in a country that has perennial issues with flooding. Defra must require Southern Water to pursue more sustainable, adaptable solutions which work alongside climate change and work for the environment. I would also ask that where possible Defra works more rapidly to progress the implementation of broader policies for water catchment in the construction industry (e.g. Building Regulation improvements) and across society (e.g. sustainable drainage for agriculture and golf courses). | Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>We will continue to rely on Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs) as means to reduce demand during droughts.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans. |
| WRMP987 | Dear Sir or Madam,<br><br>This is a letter from a concerned resident, local business man and family man:<br><br>Simply put I believe that the proposal does little if anything to benefit the consumer and everything to give the company an excuse to hugely hike the price of water in our borough.<br><br>All who have spent time looking at the plans would far prefer that the newly created Havant Reservoir was used to collect rain water rather than recycled grey water. It would also be far preferable if the water within the reservoir was used to service the Havant Borough rather than be sent to Southampton as a result of Southern Waters over abstraction on the Test and Itchen.<br><br>The many leaks within the borough need fixing, more rainwater needs collecting, and a more holistic approach needs to be used rather than paying for exorbitant technologies better suited to water poor countries such as the Arab states being used to treat water here. The UK is becoming increasingly wet and windy as a result of climate change and this presents an opportunity to help service our water needs.<br><br>I am entirely against this proposal, and wonder what our water supply will contain in a decades time should this proposal go ahead. We know that currently our tap water is full of toxins including levels of nitrates well above WHO recommended levels, we have heavy metals, plastics and PAHs coming out of our taps and all this before its recycled from our effluent. I dread to think of how much worse it may become. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. |

| Reference | Feedback | Southern Water Response |
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| | No to recycling. We dont need it (fix the leaks), we dont want it (collect the increasing amount of rain), and we wont pay for it - we are already paying southern water for services they supposedly provide but fail to deliver - such as waste water treatment. If they cant treat our waste will they really be able to provide our water in this manner. I do not believe so. It seems an increasingly complex solution to a very simple problem - leaks and water storage.<br><br>The government needs to step up and make water companies responsible for the degredation of our natural resources. This proposal benefits the corporation - and doubtles the nameless MP's who have shares in this company now registered in Hong Kong. People and pure water not profit and pollution please Defra. | The leakage reduction target set by the Government is 50% by 2050.We are plannin to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire and to create a sustainable source of supply. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including “forever chemicals” in the purified recycled water produced.<br><br>We note your point on rainwater storage and our plan does include constructing two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It is worth nothing that reservoirs do require a unique set of geological, geomorphological and hydrological settings to be viable. |
| WRMP988 | Dear Defra team,<br>I live in Hampshire and am very concerned about the environment and climate change and am therefore writing to object to Southern Water's revised draft Water Resources Management Plan. My objection concerns [redacted] WWTW at Havant and the fact that Southern Water are proposing to use Portsmouth Water’s Havant Thicket Reservoir for use as an environmental buffer lake. Recycled effluent will be pumped to Havant Thicket reservoir, with an equivalent volume of mixed water from the reservoir then being moved via a new 40km pipeline from Havant to [redacted] Water Supply Works near Winchester, for final treatment into the Southern Water supply network.<br><br>For me this has two main issues: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England’s Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable |

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| | 1. The use of reverse osmosis: the effluent recycling plant is documented for use as a 'drought resource' but the plant will have to operate year round, even when the water is not needed, in order to maintain the 'sweetening flow' needed to keep the pumps and membrane filters in good working order. This will require huge amounts of energy. Many experts with experience of running reverse osmosis plants in the UK and elsewhere have found they are very difficult and expensive to operate and maintain. Most companies have ultimately abandoned them, including Thames Water. Southern Water have a poor record of treatment plant and pumping station failures, many prosecutions for pollution incidents and failure to take prompt action to rectify problems. The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is unacceptable.<br>2. The proposed pipeline: The route will cut a 40km swathe through the countryside, 50m wide (reducing to 20m in 'sensitive areas'). We are facing an ecological crisis. The pipeline will block habitat connectivity for small birds, bats, other small mammals, insects and other fauna. Many rare bat species depend on hedges and tree lines for commuting and foraging, with roosts in trees. Gaps as small as 10m will block many species from following a commuting corridor. Such a large project will remove alternative routes that the bats could take, so they are unable to reach foraging areas when travelling from their roosts (see www.whatthesciencesays.org/briefing-sheet-hedgerows/ ). The construction of the pipeline will have also an enormous carbon footprint due to soil disturbance and concrete manufacture etc.<br><br>I firmly believe that this plan is following the wrong path. We need to focus on developing more sustainable solutions, which work with climate change to collect the forecast increase in winter rainfall and store it in new reservoirs and confined aquifers for use in dry summers. We get plenty of free rain but only collect 1% of rainfall in the UK. Collecting and storing more water in winter would also provide multiple benefits to society, helping to reduce the forecast increase in flooding, provide recreational sites for our communities, and provide biodiversity opportunities if we build more reservoirs. We also need to work on reducing leaks in the system. A further suggestion is to abstract water for Southampton from the lower reaches of the Test and the Itchen rather than the upper reaches as at present. This would mitigate the need for water being brought from Havant Thicket. I believe these options have not been presented as alternatives to the plan.<br>As I understand it part of the problem is the way water companies can get funding. It is much easier to obtain funding for large infrastructure projects. Using lots of smaller solutions may be better for the environment and more cost effective but does not secure funding. This situation is completely wrong and needs to be addressed. | parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>All plans will be subject to the appropriate environmental due diligence as they evolve.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory |

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| | | fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. |
| WRMP989 | Dear Defra,<br>I am deeply concerned about Southern Waters proposals for an effluent recycling facility at Havent. It looks like the worst choice.<br>It would be very expensive to run due to the amount of energy needed.<br>I'm worried that Southern Water would fail to manage this complex process effectively and frequent breakdowns supply and safety issues could ensue<br>Surely, tackling Leakage, mains renewal<br>and increasing sustainable storage (eg using aquifers or reservoirs) should be prioritised over recycling effluent in the first instance. These steps would reduce the need for effluent recycling and be far more efficient in terms of energy usage, timescale and carbon footprint.<br>I'm not sure I'd even want to drink the water from effluent recycling because I wouldn't trust it to taste good or have had all the toxins fully removed. I'd much rather more rainwater was saved and fewer leaks.<br>I'm concerned that the construction on that site would affect the local ecology and water table.<br>I'm concerned that the concentrated by product will damage ecosystems at the outflow and would migrate to pollute Chichester harbour.<br>It just seems the wrong approach because recycling effluent before focussing on controlling leakage and increasing sustainable storage is like putting the 'cart before the horse'.<br>I question their choice to pursue effluent recycling over simpler, cheaper and greener solutions. Is it driven by the pursuit of profit? I question their population figures as these seem rather inflated.<br>I have read these suggestions for what DEFRA ought to do and I agree:<br>1. Scrutinise the population figures that are used for the business case<br>2. Demand the leakage and mains renewal programme are accelerated and brought forward more quickly. Striving for a 70% reduction in leakage by 2050.<br>3. Add moving the abstractions on rivers to the tidal limits/ final weir as an option now so it can be assessed by the Environmental Agency now.<br>4. Brind forward the investigations and trials on the use of identified confined aquifers to store winter water for use in dry summers, not delay this for consideration in WRMP29.<br>5. Bring forward the Test Managed Aquifer Storage scheme, with investigation and testing starting immediately.<br>6. Identify more sites for reservoir storage.<br>7. Require the environmental impacts of effluent recycling and desalination schemes to be better understood before they are selected. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back |

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| | 8. Retain the threat of Hosepipe bans as a mechanism to educate and nudge consumers into reducing their water use.<br>9. Use tiered, monthly water billing so the lowest consumers are rewarded and the most wasteful consumers pay for all consumers who use less than 100l/day.<br><br>Please use your position and expertise to scrutinise this plan and apply some common sense to help deliver the best solution for customers and for the environment. | in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ |

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| | | level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value.<br><br>We will continue to rely on Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs) as means to reduce demand during droughts.<br><br>We plan to conduct tariff trials once our smart metering plan is implemented and we have a better understanding of the way demand varies daily and seasonally along with key household attributes (property type, household composition, socio-demographic variables etc). This will help us select a representative sample as well as an appropriate tariff model (rising block, reducing block, seasonal) to test. |
| WRMP990 | Hello<br>I am unfortunately a Southern Water customer. I live in Emsworth. I am also a year round sea swimmer, so I know a bit about Southern Water's exceedingly poor performance doing the job all the other customers and I pay them to do.<br><br>I have heard about Southern Water's plans to use the new Havant Thicket reservoir as an effluent recycling facility. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | I reject this proposal on the grounds that I have zero trust in Southern Water to deliver the plan safely. The effluent recycling scheme they propose is untested in the UK. Why would we trust a major polluter to accurately and safely use new reverse osmosis technology to provide clean water?<br><br>The landfill site they have chosen is another major red flag, as is their complete disregard for greener solutions such as harvesting rainwater and fixing leaks in existing pipes.<br><br>When I went for a swim today from Emsworth Sailing Club (with 8 other women), we were all disgusted by large brown bubbles, that did not pop when swam near, floating on the surface of the water. It's a daily reminder of the negligence of our water company, who are meant to be providing the most basic of all human rights!<br>Southern Water, clean up your act. Defra, please force them to do better. | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. Your objection to the use of recycled water in Havant Thicket is noted.<br><br>We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can |

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| | | realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP991 | Dear Sir/Madam<br><br>I wish to register my strong objection to Southern Water's revised draft Water Resources Management Plan and request it be rejected by DEFRA. I believe this Plan is flawed, self-serving and short-sighted.<br><br>This current Plan is barely different to the last one which was rejected by DEFRA. The present Plan seeks to justify Southern Water's proposals for energy-intensive, profit-driven schemes such as effluent recycling rather than working towards more long-term sustainable, cost-effective and environmentally-friendly alternatives.<br><br>Southern Water currently loses 100 million litres of treated water daily through leaks, amounting to 19% of its supply. The revised Plan states Southern Water aims to reduce this to 10% by 2050 - this isn't ambitious enough over such a 25-year period. Before Southern Water is permitted to build costly new infrastructure, it should repair the existing one.<br><br>Southern Water has largely ignored or dismissed sustainable solutions like expanding reservoirs, using aquifer storage and moving extraction points. I am aware that the UK only collects 1% of its rainfall. Why isn't there more focus in the Plan on improving this figure, especially given climate change and global warming is likely to increase rainfall? In the past Southern Water has complained that the planning system has held up reservoir plans but this is blatantly untrue where Havant Thicket is concerned. Once applied for, planning permission for the original Reservoir fed by chalk-fed streams was obtained pretty quickly.<br><br>One proposed site for an aforementioned effluent recycling plant is at Broadmarsh (Havant) which would be built on an old landfill site, risking contamination of Langstone Harbour through leaching during construction. The proposed plant risks being a costly white elephant, involving major construction work for this and the proposed pipeline to [redacted], costing £1.2 billion and rising, the burden of which will result in significant bill increases for local residents.<br><br>The Plan even includes bizarre suggestions to tanker water from Norway - an idea previously dismissed as expensive, environmentally unsound and risky.<br><br>I urge DEFRA to reject Southern Water's plan in favour of more sensible, rational options. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding our options process, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. We note the objection to the use of recycled water in Havant Thicket.<br><br>Regarding cost, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding the energy used, water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each |

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| | | successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan. |

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| WRMP992 | I want to notify you off my total opposition to the Sewage effluent recycling/toilet to tap plan at Havant Thicket Reservoir. I have many reasons and concerns, which I will fully explain.<br>I live close to the Havant Thicket Reservoir site.I am a very concerned resident who has lived here for over 25 years. My elderly parents are not familiar with composing emails, otherwise they would have contacted you too.<br>I am a Stakeholder on Havant Thicket Reservoir project after receiving a kind invitation from the CEO of Portsmouth Water a few years ago I intend to attend the meetings more regularly again in the New Year, as I have missed some due to family caring responsibilities. Two local residents and friends of mine are also members and have kept me updated on various details.<br>Southern Water insist that they plans to reach Carbon net zero by 2050. This plan is utterly ludicrous as this plan is extremely Carbon heavy, energy intensive and environmentally damaging in lots of ways!<br>I am sure it would be incredibily lucrative for both Southern Water and Portsmouth Water though, as NSIP's granted via DCO's attract huge amounts of money and are incredibly profitable for them both. I am concerned about the fact that the Southern Water customers are footing the bill through massive increases in their bills over the years. Ofwat have insisted that Portsmouth Water customers won't foot the bill, as agreed several years ago when the unique 80 year supply deal was struck between both water boards and signed off by them, therefore it appears that Portsmouth Water customers are protected from these increases. Hopefully, this agreement is set in stone.<br>The cost of this scheme has already risen to £1.3 billion, which no doubt will continue to rise exponentially over the years if this horrendous scheme is approved! I have attended public meetings with Southern Water and Portsmouth Water and various events in the area designed to brainwash everyone that there is absolutely no alternative to this plan! The marketing teams are experts at dealing with the public and batting away relevant questions and concerns, like politicians. Nothing was answered in a satisfactory way, when I asked relevant questions and they were basically evaded. Nevertheless, I have done my own reserarch as have many others, in a local environmental group, ai am a member of and none of us are NIMBY's.<br>The amount of energy needed to build and run this facility will be immense and a huge drain on the National Grid!<br>There is no benefit whatsover to for our local area to the environment by building this environmental buffer lake. This was deliderately 'sold' to the local residents as a beautiful nature facility and lake akin to Petersfield lake. The slick marketing material made it look wonderful! Also originally everyone was told it would be a green leisure hub with water sports, bird watching, fishing and many other amazing facilities. There has been total destruction of over 14 hectares of ancient woodlands, not including the ephemeral trees, plants, flora and fauna bullzoded for all this at Havant Thicket, for something entirely different to what was promised Havant Borough Council and East Hants District Council! This was agreed as a Spring water fed reservoir only and this is why it was approved by them both!<br>The Principal planning officer at the time who was in charge at both councils insisted any change of use would be decided by them at local level. However this was untrue as it was taken out of their hands as soon as the reservoir footprint had been agreed. Southern Water have gone over their heads to the government instead! They are objecting to this proposal for a complete change of use too. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding carbon and energy, water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Regarding the environment, our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

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| | The excuse for this project has been to protect the precious chalk streams from oner extraction. These are the very same chalk streams that regularly receive raw sewage discharges.It was reported again on the local news programmes recently on television on this ongoing pollution issue.<br>This sheme isn't needed as we have plenty of rainfall in the UK and Havant has an abundance of natural underground Springs, which is why reservoirs have been refused here in the past.<br>We are not a desert nation that has no other choice! In Singapore, for example there is a huge consumption of bottled water and other places like Dubai to avoid the tapwater Dubai has one of the highest bottled water consumptions per head in the world with 275 litres per person, due to concerns about the heath risks of reverse osmosis treated sewage effluent. This will happen here if the toilet to tap plan goes ahead. The PFAS forever chemicals and endocrine disrupting chemicals and hormones cannot entirely removed by reverse osmosis and not all Benzene a dangerous Carcinogen can be removed either.<br>We will be the trial or 'guinea pig' area to see if it affects people's health detrimentally as this has never been done in the UK before! Unfortunately it will be hard to prove how people have got ill from ingesting the water it is not a gamble worth taking.<br>If Southern Water got on with fixing the thousands of leaks this would not be needed at all. Rainwater can be captured by buliding several smaller reservoirs nearer to where they are needed in Southampton and Winchester and by using underground storage aquifers. Moving extractions up to the tidal limit will also make a difference.<br>The cost of running this all is estimated at 3 to 5 million pounds a year as it has to run non stop all day every day throughout the year! We currently only collect 1% of rainfall for drinking water, this must change, building reservoirs to capture this is an obvious and simple solution.It is ridiculous to recycle toilet water when we have so much rain which leads to regular flooding. These rainwater reservoirs would reduce flooding!<br>To justify this scheme every single, most unlikely hypothetical scenario has been used; massive population growth, (birth rates have declined dramatically this year actually), the most severe and extremely ulikely droughts and the most severe limits on river abstractions. This really helps to convince you they are right although it is obviously disengenuos! if a good proportion of the the leaks were fixed where 98.5 million lites of water a day are lost, this would never need to be considered!<br>The brine by product will be incredibly damaging to the harbour and waterways that will result from this. I am also very concerned on the plan to bulid a huge new sewage works at Broadmarsh on an old ladfill site that is 13 metres deep. Pilie driving into this will cause leachate of so many toxic substances into the harbour and contaminate it so much. Also noxious gases will be released into the air. None of this should be disturbed, it's an environmental distaster we face if this is approved!!<br>Please insist on environmentally solutions instead as I have suggested above and protect human health and nature from this. | In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Regarding bills, the way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the The Hampshire Water Transfer and Water Recycling Project (HWTWRP) as well. The HWTWRP is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. The water recycling proposals are not expected to impact the proposed recreational use of Havant Thicket reservoir.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>Our estimated cost for Havant Thicket Reservoir is included in our Water Resources Planning tables. We do not recognise the figure for £1.3 billion for the reservoir.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. The water recycling proposals are not expected to impact the proposed recreational use of the reservoir.<br>.<br>The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so. Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation |

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| | | feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>Our Business Turnaround Plan \| Southern Water<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>The advanced treatment processes used in water recycling are used around the world to remove nutrients, pharmaceuticals and other impurities. Reverse osmosis and other elements of the Full Advanced Treatment process provide robust removal of impurities including "forever chemicals" in the purified recycled water produced.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/ |

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| | | The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>We have considered multiple combinations of growth forecasts, climate change impacts and Environmental Destination. This was covered in Section 5 of our rdWRMP24 technical report. The range of supply-demand balance scenarios in Water Resource Zone (WRZ) as shown in Annex 11 to our rdWRMP24 technical report, covered both extremes i.e. the combination of high growth, high climate change impact and high Environmental Destination (supply-demand balance Situation 1) as well as the combination of low growth, low climate change impact and low Environmental Destination (supply-demand balance Situation 9).<br><br>We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 34% to 7% growth at the company level between 2025 |

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| | | and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity. This requirement is set by the government, not by water companies.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. |
| WRMP993 | Dear Sirs<br><br>As a long time resident of Hayling Island, an elected member of the local council and a Southern Water bill payer, I am writing to express my strong objections to the Southern Water Resources Management Plan.<br><br>My concerns are as follows:<br>1. Lack of Consideration for Alternative Solutions: The current proposals have not adequately considered lower-cost and faster to market alternatives. The Effluent Recycling Scheme proposed for Havant is not going to result in a single drop of additional water for bill payers until 2035 at the earliest. The lack of investment over the previous decades has now made it even more imperative that speedy action is taken now. The UK water industry too often favours large-scale schemes over simpler, less capital-intensive solutions, localised solutions which can be replicated in multiple locatiosn quickly and cheaply. Examples of alternatives include new boreholes and river abstraction close to the sea. Southern Water should explore solutions to store natural water from abundant winter rains for use during dry summers.<br>2. Environmental Pollution: The effluent recycling scheme poses substantial environmental concerns, particularly regarding the discharge of concentrated reject water into Langstone Harbour and the wider Solent. Langstone Harbour enjoys a number of legal protections. This internationally important habitat is already under threat from years of pollution. The Environment Act asks us all to seek solutions that will benefit Nature. I ask you to ensure | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1. Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can. Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br>2. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our |

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| | that environmental protections for Langstone Harbour are held as high as those for the River Itchen and Test, they are all equally important. The construction phase involves deep tunnel shafts into an historic landfill site, whose harmful toxins pose significant risks to Langstone Harbour's delicate ecosystem.<br>3. Energy Intensity: The proposed reverse osmosis solution for the [redacted] site is highly energy-intensive and has never been used at scale in the UK. This technology is generally deployed in hotter climates with large amounts of renewable energy. Additionally, the site is 40km from where the water is required, making the scheme a high-carbon solution with an annual running cost of over £3 million. The recycled effluent scheme is aimed to assist in times of drought, however in order to keep the pipeline sweet it will have to run continuously whether or not we are in a drought period. This means that during prolonged periods of rainfall pumping will still need to take place, in effect moving water between one site and another not for anyone to use but simply to keep the flow moving.<br>4. Lack of Focus on Leakage: Southern Water needs a more ambitious program to reduce leakage. It has not met the commitment it pledged to OFWAT in it's previous business plan. More focus should be made to incentivise Southern Water to fix their leakage issues. Currently, 3% of water taken from the environment is lost before reaching the treatment works, and a further 19% of treated water is lost in the distribution network. Southern Water has been slow to invest in advanced pressure management solutions which are relatively low cost and can be used to help reduce leakage. More focus should be placed on this and a catch up plan put in place to get Southern Water back on track.<br>5. Deception Regarding Havant Thicket Reservoir: The Havant Thicket reservoir was sold to the public as an environmentally led resource, a world first reservoir fed from chalk aquifers. Mixing this with output from the Effluent Recycling Scheme will degrade the water quality without giving Portsmouth Water customers the opportunity to object as this process has been taken out of local authoritites hands.<br>6. Funding of the Hampshire Effluent Recycling Scheme: The cost of this scheme is enormous and will be debt-funded, which seems to be a backdoor enrichment of Southern Water shareholders. I believe the debt should be funded elsewhere, or the profits on the debt should be included in the profits shown by Southern Water as part of the scheme.<br>7. Inadequate Public Consultation - Southern Water Customers who are not on the pipeline route have not been consulted on the Effluent Recycling Scheme. This means that a city the size of Portsmouth which will be affected by the disruption caused by the build phase, will be exposed to the potential harms of this scheme, will be drinking the water and paying the costs of this in their bills are completely oblivious to this proposal.<br><br>I urge you to reject the current Southern Water plan and require Southern Water to develop a more sustainable plan that prioritizes the environment over profit.<br>Sincerely, | decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br>3. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br>4. The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br>5. Regarding planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br>6. The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br>7. Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |

| Reference | Feedback | Southern Water Response |
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| | | Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP996 | It has come to our notice that there is a plan to use recycled effluent to top up the new reservoir at Havant thicket. The ecology of the new reservoir would be harmed as well as the infrastructure being extremely expensive when there are less expensive, less carbon heavy alternatives available.<br>Rainwater collection is only 1% at present and efforts should be made to increase thus low percentage. Leakage is currently huge and should be addressed before investing in this plan.<br><br>We urge you to use your power to force Southern Water to explore more environmentally friendly and economical alternatives. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst |

| Reference | Feedback | Southern Water Response |
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| | | having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans. Regarding effects of recycled water on local ecology, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. |
| WRMP997 | From everything I read it seems absurd for Southern Water to spend such a huge amount of money on this "reverse osmosis" plan. I have so little faith in this water authority that I fear anything could go wrong in building and maintaining this facility. I gather from experts that there are several much cheaper and equally effective ways of topping up the reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the quantification of cost, yes, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany |

| Reference | Feedback | Southern Water Response |
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| | PLEASE do not let this current proposal go through. | our plan and are scrutinised by Ofwat as part of our Business Plan. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>Our Business Turnaround Plan \| Southern Water<br><br>The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges. |
| WRMP998 | I am emailing you to ask you to make sure that this dangerous, ill-conceived, environmentally & wildlife damaging & community disrupting monstrosity is not built.<br><br>This project has NOT been rigorously investigated and after all their pushing of this proposal, they are only just doing the CCT testing & it is so far proving that this area is not suitable for this proposal (but I understand they intend to go ahead anyway despite local objections)<br><br>Our locality around this area has always been prone to flooding & this has worsened in recent years, due to a variety of reasons, (not least of all, mismanagement & failure to look to the future by increasing sewage capacity & fixing of leaks by Thames Water. )<br>Thames Water have NOT looked ahead to what is needed with the tens of thousands of new houses in estates built all over Grove, Wantage, Hanney, Steventon, Drayton & Abingdon, not mention the outlying villages with smaller estates being built. These are all largely built on farmland & floodplains.<br>The water table in this whole area is quite high (for example, in the Grove Cemetery, the graves can fill with water overnight before the coffin can be put in the hole)<br>This proposed reservoir will disrupt many small local watercourses vital for drainage & can only worsen the flood risk, plus it is now estimated that the weight of this thing will actually raise the height of the water table by up to a metre.<br>The narrow roads in this rural area are full of potholes. The edges are crumbling & it is not fit for heavy lorries & machinery.<br>Thames Water could increase capacity if they had a rigorous & effective ongoing plan to maintain & replace pipework alongside an effective responsive system of fixing leaks ( of course actively looking for & repairing leaks during the course of "routine maintenance" for the past 20 years might also have helped conserve water)<br>Displacement of wildlife, local watercourses & the local chalk stream, will cause harm, not to mention farmland lost & our roads & communities adversely impacted.<br>The albeit small risk of the reservoir bursting would be catastrophic. | Thank you for reviewing the Southern Water rdWRMP24 and providing feedback. Your comments relate to sites within the Thames Water area, therefore should be directed to Thames Water, we are unable to respond to these as part of this consultation process.<br><br>As part of public consultation on SESRO in summer 2024, a number of documents were issued and clearly mentioned the planned capacity for the reservoir (150 million cubic meters). The documents are available on the Thames Water website. See, for example,<br><br>South East Strategic Reservoir Option (SESRO) - Thames Water Resources Management Plan |

| Reference | Feedback | Southern Water Response |
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| | Finally, I would add that Farmoor reservoir is not full & cannot be filled by water from the Thames ( where this reservoir is also to filled ) because it is so polluted with raw sewage (all dumped in there by Thames Water!!!)<br><br>Thames Water, as we all now know, is corrupt at it's core.<br>They have proven themselves to be greedy, self seeking & concerned ONLY with profit for shareholders & investors.<br>Evidence shows they are at the very least incompetent & unable to deliver a service that has consumers benefit at it's core. Quite the reverse.<br>They should increase sewage treatment capacity, fix the leaks & stop polluting our environment.<br>So NO! NO! NO! To Thames (incompetent, untrustworthy & much despised) Water. | |
| WRMP999 | Defra should only look at solutions that don't require high levels of energy consumption, nor should they be letting Southern Water run with the ball. Anyone with a brain knows that the conversion of sewage into drinking water is problematic and nobody wants it. This is also expensive which is why Southern Water plans to increase customers' water bills. The whole thing is scandalous. We are a democracy and we shouldn't be dictated to by the likes of Southern Water or anyone else. We the people have spoken against this private, ill-conceived plan. It's the same as raising your taxes. Why can't you just separate drinking water from sewage water in all homes, particularly new ones. This is another example of "follow the money". | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife.<br><br>This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. |

| Reference | Feedback | Southern Water Response |
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| | | We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers.<br><br>Our Business Turnaround Plan \| Southern Water<br><br>Regarding safety, no untreated wastewater will enter the reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to the reservoir.<br><br>The recycled water will be subject to the same stringent quality checks and requirements as other drinking water sources. We do not have any evidence to suggest that recycled water poses a higher risk than in other drinking water supplies.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Regarding bills, the way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |

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| | | Regarding cost, we carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were no taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Regarding profit, Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP1000 | Southern Water Revised Draft WRMP2024 Consultation<br><br>I write in response to Southern Water's consultation on the revised draft WRMP 24 and specifically the Sussex North Water Resource Zone (SNZ) within its Central Area and more specifically the reliance, if any, on groundwater abstraction at [redacted]/Pulborough, on behalf of Crest Nicholson, who have land interests in the affected WRZ.<br><br>1. Water Industry Act Obligations<br><br>Under the Water Industry Act (WIA) there is a statutory framework in place that places a duty on the water undertaker to provide supplies of water to persons who demand them (s37 WIA). In addition, Southern Water has the duty to supply potable water without causing harm to the environment, specifically, for these purposes, the Arun Valley SPA/SAC/Ramsar sites, which are protected under the Conservation of Habitats and Species Regulations 2017 (the Habitats | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>Your comments on our obligations within the Water Industry Act are noted. At no point have any requests for supply for developments been refused by Southern Water, We take our duty to protect the environment very seriously through compliance with our licences and our future planning processes such as our WRMP.<br><br>1) Natural England applied the precautionary principle in issuing its Position Statement on Water Neutrality in the Sussex North WRZ. At the time of the introduction of the Position Statement, no link had been demonstrated between the groundwater abstraction at Pulborough and any impacts on the sensitive ecosystems downstream of the abstraction. We commissioned a study in 2021 to investigate any impacts of our groundwater abstraction at Pulborough on the downstream ecosystems. The Environment Agency, Natural England, Royal Society for the Protection of Birds (RSPB) |

| Reference | Feedback | Southern Water Response |
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| | Regulations).<br>This is a two-fold duty, the first is to supply the water, and the second is to do so without causing harm to the environment, specifically including the Arun Valley sites.<br><br>2. Natural England Position Statement:<br><br>Natural England have identified through their Position Statement in September 21, that a potential linkage between groundwater abstraction at [redacted]/Pulborough and the Arun Valley sites cannot be excluded beyond reasonable scientific doubt. Consequently, they are not able to exclude the potential for adverse impacts at these habitat sites associated with groundwater abstraction from [redacted]/Pulborough.<br><br>3. Voluntary reduction in groundwater abstraction<br><br>In response to Natural England's concern, the Environment Agency accepted a voluntary reduction by Southern Water to reduce abstraction from their historic level of 13Ml/d out of the permitted 36Ml/d to a rolling average of 5Ml/d.<br><br>4. The Sustainability Review<br><br>The EA responded by commissioning a Sustainability Review of the [redacted]/Pulborough groundwater abstraction which is due to report in March 2025. That will be followed by action, if necessary, by the EA under Section 52 of the Water Resources Act (WRA), which itself will be subject to an Appropriate Assessment under Regulation 63 of the Habitats Regulations.<br><br>5. The Current Position<br><br>Natural England have not updated their Position Statement and are continuing to advise local planning authorities to insist on water neutrality until the Environment Agency have established the acceptable levels, if<br>any, of groundwater abstraction at [redacted]/Pulborough and have acted accordingly.<br><br>6. The WRMP Process<br><br>The WRMP process is to demonstrate how sustainable supplies of water can be provided for projected need without constraining growth (see 6.3 of WRPG2) in a manner consistent with the Habitats Regulations (see 9.4.3 of WRPG).<br><br>7. The WRMP must not rely on water neutrality<br><br>In essence, water neutrality is an insistence that those who have a right to connect and receive a supply under the WIA duties imposed on the Water Undertakers must first establish that they will have no net increase in demand for water from the water undertakers. In the context of a | and Sussex Wildlife Trust are involved in the study. The results are expected in summer 2025.<br><br>We have voluntarily reduced our groundwater abstraction at Pulborough while the study in ongoing. It would be premature to make a final decision on the status of the Pulborough groundwater abstraction until the study is completed and the outcomes are known.<br><br>The scale of reductions in our groundwater abstractions, if any, will depend on the outcome of the study mentioned above. If a link between our groundwater abstraction at Pulborough and deterioration of downstream ecosystems is established, it may not necessarily lead to a revocation of our groundwater licence if the impact can be mitigated by reducing the abstractions. Should the policy and requirement for Water Neutrality continue to be in place following the conclusion of the investigations at Pulborough, we will continue to engage with all relevant stakeholders and customers in Sussex North WRZ on the water efficiency measures we will be implementing to enable growth.<br><br>2) Outside of Sussex North we support the concept of water neutrality, which existed prior to the Position Statement in Sussex North, as a method for developing efficiency in demand management, this is discussed in Annex 22 of our draft WRMP documents. Annex-22_Water-Neutrality.pdf<br><br>We note your comment.<br><br>To your point regarding reliance on water neutrality, Southern Water does not propose water neutrality in Sussex North as an alternative to fulfilling our duties and will continue to ensure sufficient water resources are available. The Position Statement issued by Natural England is in reaction to specific conditions on the site, which is not related to the capacity of water in the networks which developers would wish to connect to. Any developer with appropriate planning consent from the Local Planning Authority (LPA) will be able to connect as normal. We do not influence the decision of the LPA on whether planning consent should be granted.<br><br>7) Specifically with regard to the need to make provision for a scenario of zero groundwater abstraction at Pulborough, we have not included that scenario in the Plan, because we are awaiting the results from the Sustainability Study due to complete at the end of March 2025. Those results will then need to be validated by the Environment Agency. The output from the Study will then be used to guide discussions with the Environment Agency about future levels of sustainable abstraction at Pulborough. We will expand on the results of the sensitivity analysis around groundwater abstractions at Pulborough to illustrate the changes in our strategy should the outcomes from the investigations warrant a reduction in or revocation of groundwater abstraction at the site.<br><br>8) Please see answer to (8) above. |

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| | WRMP, reliance on water neutrality by the Water Undertaker is an abnegation of the Undertaker's duties under the WIA regime.<br><br>8. Consequences of the Sustainability Review<br><br>In the Sussex North WRZ the EA Sustainability Review will determine what, if any, groundwater abstraction at [redacted]/Pulborough is sustainable and consistent with protecting the Arun Valley sites. That could be all of the current permitted licence levels, some of it, to be determined, or none of it. If the sustainability review concludes there is doubt remaining as to the potential impact, Reg 63 (5) of the Habitats Regulations will require no abstraction. This will be known from March 2025. Consequently, the WRMP must make provision, as of now, for a scenario of zero groundwater abstraction at [redacted]/Pulborough.<br><br>9. The need to consider zero abstraction from [redacted]/Pulborough<br><br>Section 7 of the rdWRMP Technical Report3 (under section 7.3.2 '1. Changes that resolve supply-demand balance through an alternative solution…include:<br>• Reducing Pulborough groundwater DO in SNZ from 13Ml/d to 5.55Ml/d from 2025 followed by full revocation from 2030-31 (see S11 and S23 in Table 7.69)' refers to scenarios of reduction of reliance at [redacted]/Pulborough including reducing to zero from 2031.<br><br>As far as we can discern, the rdWRMP doesn't assess a scenario of zero abstraction from 2025. In the light of 8 above, the WRMP will need to do this if it is to fulfil its function. | |
| WRMP1001 | I write with regards to the proposed recycling of wastewater effluent into Havant Thicket reservoir.<br><br>Whilst the technology being proposed has been demonstrated in countries such as Singapore and California these are quite energy intensive approaches and the efficiency in removal of some shorter chain anthropogenic compounds such as PFAS has not been demonstrated sufficiently as safe. For example, new epidemiological data from Singapore puts PFAS in the population as relatively high compared to other SE Asian countries and their food standard agencies consider PFAS in seafood as low. Those with higher PFAS have lower fertility and higher birth defects compared to those with lower PFAS in their blood. This would indicate that PFAS maybe present in some drinking water especially when these studies found no differences in ethnicity which links to diets.<br><br>Whilst desalination and effluent recycling may well be required due to climate change in South East I do not think the better use of less carbon intensive approaches such as further reservoir development in the area has been fully explored which could help also with nature targets and green spaces and ease pressure on spring fed chalk streams. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. All of the hormones tested in trials conducted by SWS (testosterone, progesterone, estriol and estrone) returned a non-detect result. Although it is true that not all the pharmaceuticals and personal care products (PPCPs) are rejected by reverse osmosis membranes, our results recorded concentrations an order of magnitude, or lower, than found in wastewater.<br><br>Regarding PFAS, there are currently no statutory standards for PFAS in drinking water England and Wales, nor is there a World Health Organisation guideline value. The DWI has taken a precautionary approach and produced tiered guideline values for water companies to adhere to with a guideline value of 0.1 micrograms per litre for the sum of 48 named PFAS, which is equivalent to 0.1 parts per billion.<br><br>With regard to your specific point regarding epidemiological evidence, Southern Water must comply with stringent standards established by our regulators which take such evidence into account, the Drinking Water Inspectorate (DWI) would be able to provide further detail. For |

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| | | more information about the DWI and how it regulates the quality of drinking water, please visit the government website https://dwi.gov.uk/<br><br>Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |
| WRMP1002 | We cannot believe that the idea of using this questionable recycled water, entering the reservoir for a main source of drinking water, when it is quite possible to adopt a lesser expensive alternative via the "" raw water"" source from the company's local chalk-fed freshwater springs. The alternative plans incur a greater cost and works against our efforts to achieve "" net zero carbon "" figures.<br>If this is allowed to go ahead the ecology of the reservoir will be irreversibly damaged for future generations. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future.<br><br>Regarding effects of recycled water on the ecology of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. |

| Reference | Feedback | Southern Water Response |
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| WRMP1003 | We are writing to strongly object to the above proposal to implement this scheme at the Havant Thicket reservoir.<br><br>This is unnecessary, dangerous and Southern Water really cannot be trusted. | Thank you for reviewing our rdWRMP24 and providing feedback. We note the objection to the use of recycled water in Havant Thicket.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP1005 | I wish to lodge May concerns regarding the above proposed plan by Southern Water.<br><br>The cost of the scheme would be better spent on a more sustainable safer solution. There has been inadequate considerations of the impact on health and the environment.<br><br>Southern Water have a responsibility to demonstrate that health and the environment are its priority - this scheme falls short of that.<br><br>Plans which do not consider reducing energy use should not be accepted. Poor solutions in one area of the country will be mirrored in others.<br><br>Water is a precious resource which is a fundamental element of the UK household and outdoor environment, its purity has already been impacted negatively.<br><br>I object to this scheme and ask that another more sustainable safe solution be requested. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. Environmental sustainability is a key criterion in our options appraisal process. This will continue to be the case for WRMP29.<br><br>As a major abstractor of water in the South East for public supply, and with responsibility for the conveyance of wastewater from homes and businesses for treatment before it is returned to rivers or sea, Southern Water plays a critical role in carrying out these duties whilst protecting and enhancing the environment. Further information and reports on how we achieve this can be found on our website https://www.southernwater.co.uk/about-us/environmental-performance/protecting-and-improving-our-environment/<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. |
| WRMP1006 | Trying to understand the complexities of water supply over such a large area with very different catchment areas is extremely difficult for the lay person. Data in the consultation documents is confused with various demand figures and dates quoted none of which can be clearly followed through and all of which seem to take a worst-case scenario.<br><br>We are presented with a single option of either wastewater recycling or saltwater recycling, both of which are highly capital intensive with high running costs and even higher financing costs it would seem, and with concentrated polluting discharges to the sea. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/ |

| Reference | Feedback | Southern Water Response |
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| | The targets set of 1:200-year limit by 2030s and 1:500-year limit by 2040s with no domestic drought orders up to those limits is in my view over onerous; tries to predict too far into the future, and forces the water company into drastic non environmentally sustainable solutions at the expense of developing more sustainable options in the medium term.<br><br>The approach taken by DEFRA and the EA for Adaptable Pathways for sea defence would seem a better way to approach the uncertainties inherent in supply side water demand and climate change, rather than trying to look up to 70+ years ahead in one go. | We have considered multiple combinations of growth forecasts, climate change impacts and Environmental Destination. This was covered in Section 5 of our rdWRMP24 technical report. The range of supply-demand balance scenarios in Water Resource Zone (WRZ) as shown in Annex 11 to our rdWRMP24 technical report, covered both extremes i.e. the combination of high growth, high climate change impact and high Environmental Destination (supply-demand balance Situation 1) as well as the combination of low growth, low climate change impact and low Environmental Destination (supply-demand balance Situation 9).<br><br>Both desalination and water recycling inevitably use more energy and are subsequently more expensive to operate than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. The drawbacks of any option have to be considered in view of the benefits it delivers. We have excluded desalination options in cases where drawbacks outweigh benefits or where the environmental challenges cannot satisfactorily be overcome.<br><br>Our regulatory guidance specifies that we plan to get to a 1 in 200 and then a 1 in 500 year drought resilience. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of aquatic plants and wildlife. This means that Southern Water now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. |
| WRMP1007 | I wish to object to Southern Water's water management plan for the following reasons<br><br>This solution is a top-heavy, over-engineered and energy-intensive project designed to make maximum profit for Southern Water rather than make best use of natural water. Not only are the costs huge, but the project, with 24/7, 365 days a year pumping requirement, does nothing towards a sustainable energy future.<br>This scheme does nothing about the problem of sewage discharges into our harbours – indeed, by building the water recycling plant on land that is an historic landfill, we further increase the problem of environmental damage from our water industry. Rejected water from the water recycling plant is even more contaminating than the sewage already regularly dumped in the harbours.<br>This is a hugely expensive project, and greener, more sustainable and cheaper alternatives have been discounted or not properly investigated. One suspects because they do not make as much profit for the company. There needs to be consultation on the whole range of options for water security. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted |

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| | Southern Water do not have a good reputation in terms of water management. Their constant dumping of sewage into our harbours quite rightly angers everybody and their ability to manage a project such as this with no accidental contamination is to be highly questioned. Indeed, people will turn to bottled water rather than use this type of tap water, creating even more plastic waste.<br>This scheme does nothing about the problem of sewage discharges into our harbours – indeed, by building the water recycling plant on land that is an historic landfill, we further increase the problem of environmental damage from our water industry. Rejected water from the water recycling plant is even more contaminating than the sewage already regularly dumped in the harbours.<br>We are not a drought-ridden country. Recent flooding in many parts indicate this. Our challenge is to capture and store winter water for use in dry summers. The building of reservoirs and confined aquifers would do this, as well as help to alleviate flooding in at risk areas.<br>Another possible solution that is not adequately considered is to move river abstractions to the tidal limit on the rivers Itchen and [redacted]. This has the effect of protecting the freshwater sections of the rivers and restoring natural flows. This is much simpler, and an added benefit is that because it is much closer to water treatment works and so requires fewer kilometres of pipeline.<br>Another part of the solution to water supply is for Southern Water to address the phenomenal wastage of water through leaks. Customers are currently paying for SW to lose a fifth of the water that they collect.<br>We are searching for ways of reducing our carbon footprint and address climate change and this project does neither, even though there are many ways we can resolve our water supply issues whilst addressing both these issues. | that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see:<br><br>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK |

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| | | Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. |

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| WRMP1008 | I wish to register that I am not in favour of Southern Water's Draft Water Resource Management Plan. I believe DEFRA should demand a far more sustainable plan, one that better protects the environment and contributes to mitigating the effects of climate change.<br><br>Here are my reasons for asking DEFRA to reject Southern Water's plans.<br><br>Using tankers to ferry water from Norway to the Southampton will only add to the levels of greenhouse gases and result in increasing the rate of climate change. Southern Water should be a major contributor to reducing CO2 and function as a beacon for others to follow.<br>Building and operating centres for the recycling water are extremely expensive and consume lots of energy. This runs contrary to the need for ALL to us less energy.<br>With the seen effects of increased rainfall and flooding due to climate change, Southern Water should concentrate on collecting and storing this excess water underground for use during the drier summer months.<br>The cost of building the expensive water recycling centres will result in increasing water bills for Southern Water customers, an increase which will be hard to bear in these difficult financial times.<br>Southern Water's image is not great. Instances of water contamination and network failures resulting in disruption and flooding are regularly reported in the local news. My confidence in Southern Waters ability to deliver major infrastructure projects is low. Especially in Havant where Southern Water plan to build a new water recycling centre on an old tip, a tip which the local authority has concerns about contaminants leaching into the nearby significantly sensitive environment of Langstone Harbour.<br>There are alternatives to water recycling which are less costly and can be delivered years before any new water recycling scheme comes on stream. One of these would be to move the point of extraction from chalk streams from near the source to near the mouth. This would improve water levels in these streams and continue to permit extraction at near current levels. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society.<br><br>Regarding the environmental impacts of sea tankering, this option is no longer included in our plan.<br><br>Water recycling inevitably uses more energy and is subsequently more expensive to operate than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24.<br><br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. We recognise that carbon may be significant from this option however, due to the required transport methods |

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| | | and temporary nature of the option. We will continue to assess the carbon footprint of this option and balance it against the environmental benefit of protecting the River Test in times of drought.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br>strategy.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8. The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the |

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| | | tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |
| WRMP1009 | We believe Southern Water's first priority should be tackling the sewage release crisis. Once this is done, it will have a big beneficial effect on the quality of water in our rivers.<br><br>We understand that water will become increasingly scarce in the future and we therefore support the original Portsmouth Water Reservoir project to enable the capture of surplus rainfall in the winter months so that it may be utilised in the summer months to top up the water supply. Luckily, in this location we get plenty of rainfall annually and this is likely to be ongoing. A priority for all water companies, and Southern Water in particular, should be solutions which store more free natural water for use in dry summers. To achieve this we believe there are greener and cheaper solutions, such as better use of aquifers and also creating more reservoirs. We don't believe these options have yet been properly investigated.<br><br>We are concerned that the current mixed water solution proposal is prohibitively expensive both in terms of construction and perhaps more importantly ongoing running costs. Already costs have been growing exponentially. Other environmental concerns are that more reject water which is poisonous to the environment will be pumped into Langstone Harbour. We are also worried about the impact on Langstone Harbour from gas emissions due to building on a landfill site.<br><br>We believe that in years to come Portsmouth Water customers will also be impacted. In times of drought or emergencies, or maintenance periods, we think Portsmouth Water customers will also receive the recycled water from the reservoir. A significant concern is that the recycled drinking water will taste different from the aquifer water that we currently enjoy. This will encourage more people to buy bottled water or invest in filter water cartridges which are both very bad for the environment.<br><br>We and the general public at large have lost trust in Southern Water for well documented reasons which led to the current disastrous sewage crisis. We are therefore most concerned that Southern Water will be self-regulating the discharge from the WTP into the reservoir. Monitoring of these flows needs to be completely independent of Southern Water. The current plan is unacceptable.<br><br>Conclusion<br><br>We worry that this project could prove to be a white elephant whilst other cheaper options to use natural water supplies have not yet been sufficiently investigated. We think this is a high-cost solution both in terms of construction costs, environmental damage and ongoing energy costs. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F60dd7f328fa8f50ab1d0128a%2FWater_stressed_areas___final_classification_2021.odt&wdOrigin=BROWSELINK<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding the quality of recycled water, just as water across the country has its own distinct taste influenced by the geology of the local area, so the water taken from Havant Thicket reservoir may taste different from existing supplies due to the spring water being open to the elements, together with the addition of recycled water. However, the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. For more information about water recycling, please visit the government website https://dwi.gov.uk/water-recycling/<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and |

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| | As far as we are aware, there has been little public consultation about the acceptability of the proposed project and no scrutiny of any alternative cheaper and more environmentally beneficial options.<br><br>We believe that building more reservoirs would be a much better solution than building the effluent recycling scheme. | why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. |
| WRMP1010 | I have many concerns with Southern Water's WRMP, please can you stop the current plans<br><br>The ongoing focus on recycled effluent starts in a deficit-based mode of thinking, requiring ongoing unsustainable inputs (chemicals, energy and carbon emissions, long distances and unclear water quality standards). It is said a problem cannot be solved with the same kind of thinking which created it, which requires a focus on root causes, application of the precautionary principle, prevention of further unintended consequences, long-term thinking and climate and nature literacy. I do not see these evident in the current proposal and would be willing to help build these skills and competencies in your teams who are experts in contemporary water management, yet will need to develop themselves for future water resilience.<br><br>Please can you start with a focus on water quality, it may be that whole life costing and life cycle analysis offer you a way of understanding the best options now. Please adopt the hierarchy approach (used in waste and energy) which prioritises actions for:<br>-Conservation/reduction in demand (first) - to encourage consumer behaviours to reduce water demand; to distinguish between potable and non-potable use; in particular to review and reduce commercial and large scale use of drinking water for non-potable uses;<br>-Efficiency (second) - to prevent and reduce supply side leakages and other wasteful practices; to encourage consumer leakage reduction/waste reduction through diversion of grey water/rainwater for non-potable uses.<br>-Renewable or sustainable resources (third) - rainwater capture -domestic scale, commercial and your own aquifer and reservoir storage; encourage and scale up grey water reuse for non-potable uses with largest users; with predicted increased precipitation and droughts, this makes | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery. It is not a scheme introduced in WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030.<br><br>Despite having one of the lowest PCC in the country, we have an ambitious demand management programme. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government. By 2050, our PCC will be lower than 110l/h/d. We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier.<br><br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal |

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| | sense and could also reduce pressure on the sewers which result in the current bad practice of releasing sewage into the sea during heavy rains.<br>-Non-sustainable resources (fourth) - the initial stages outlined above may help to reduce both local abstraction which negatively affects ecosystems; and reliance on Norway tankered water - in my view completely unsustainable - as shipping will have to reduce substantially to meet net zero requirements unless it is decarbonised rapidly.<br>-Conventional improvements to business as usual (after all other avenues have been enacted) - for instance, technological adaptations - this is where effluent recycling could play a role, I would urge the precautionary principle and pilot this on a small-scale for non-potable use.<br><br>Please undertake more robust collaboration and foresight around the interdependencies of truly sustainable water provision, some unsustainable issues which require your review include:<br>Carbon emissions from the proposal - not currently enabling net zero<br>Environmental impact - I couldn't find details, there is huge negative environmental impact yet this doesn't seem to be recognised and these can be avoided with the approaches outlined above<br>Ecological impact - these seem to be unacceptably high, harming the local ecology which is in rapid decline, I could not find the detailed studies you refer to and it is hard to navigate the resources you have made available<br>Population predictions - unclear and need to be locally based, and cross-referenced with other factors eg: we have an aging population in some areas, lots of development on flood plains, plenty of second or third home ownership etc<br>Climate change impacts - extreme precipitation events and the need to respond to these is not included that I could see and we must keep our sea and remaining waterways clean<br>Planning and land use changes - lack of sustainable urban drainage in current and planned infrastructure developments<br>Hampshire Grid and Hampshire zones - recent funded changes/improvements<br><br>Over all, there was so much information, even with a PhD and working in sustainability I felt put off from responding as I feel like there is a lack of transparency and a focus on profit and business as usual.<br><br>I look forward to hearing from you and hope you will pause and start from a different point to ensure truly sustainable actions for collective good. | plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050.<br>The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact.<br>As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the HRA, alongside our other environmental assessments, for the WRMP. Work is being undertaken by our consultants |

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| | | WSP to address these comments and make any necessary changes to the HRA so that it incorporates and reflects regulatory comments.<br><br>We have a dedicated team who scope and deliver natural solutions to reduce the water quality risks to our drinking water supplies, and deliver ecological resilience schemes as part of a suite of mitigation measures, including abstraction licence reductions, to address identified impacts from our abstractions. In AMP8 we are investing £90m on natural solutions, including habitat and biodiversity improvements, reduced risk of spread of invasive non-native species, in river enhancements, catchment management with the agricultural sector and Catchment Partnerships, chalk stream enhancement and SSSI management. This is a long term programme that started in AMP6, and natural solutions are embedded in our long term delivery plans.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>All water companies in England and Wales are required to plan for a drought of a 1-in-500 year severity.<br><br>We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or ‘the Act’ (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). |

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| | | Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |
| WRMP1011 | I am a Havant borough resident and wish to raise concerns regarding Southern Water's application to recycle effluent at the Havant Reservoir site.<br><br>Firstly I would like to say that the water companies involved in the reservoir development have been less than open and honest with residents regarding the development, which involved destruction of ancient woodland, loss of habitat for rare species and loss of access to the countryside for residents from some of the poorest wards in the country. Residents were assured that the reservoir would be filled with spring water and rain water, and they withheld plans for a effluent treatment centre from their original application.<br><br>Southern Water has an appalling track record of pollution and regularly releases sewage in coastal areas without earning the public. I do not have confidence in their ability to recycle water safely. We do not have a water shortage in our area, and are not predicted to have one; surplus water from our springs goes out to sea every year, and there are huge issues with water being wasted from leaking and burst pipes.<br><br>The environmental impact of the effluent recycling scheme is a huge concern with reject water from the plant being discharged at a high concentration level into the Solent. Southern Water have confirmed themselves that this will have a significant effect.<br><br>The cost to Southern Water's customers will be considerable; the site is more than 40km from where the water is needed, and the cost of treating and transporting the water will be huge. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society.<br><br>With regard to planning for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead |

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| | I believe that this development will, if allowed to go ahead, cause further damage to the environment, be at a huge cost to the customer, and be energy inefficient. I request that DEFRA refused consent for this application. | after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>With regards to your concern about leakage: The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. With regards to your concern about the Solent, a further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Regarding your comment about energy efficiency: Through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options |
| WRMP1012 | I live on Hayling Island in Hampshire and wish to object to the revised Water Resources Management Plan that I understand has been submitted by Southern Water. There are a large number of issues, but the worst (IMHO) are: | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement |

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| | - lack of a plan to adequately address the current wastage of water through leakage<br><br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes.<br><br>- high climate impact<br><br>The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. Apparently restricted documents confirmed that the Hampshire effluent recycling/ transfer scheme has a higher total carbon, average carbon emissions & embedded carbon impact than sea tankering water in from Norway! [which is also a ridiculous proposition for a country with such high rainfall as England does].<br><br>- inadequate plans to harvest more rain<br><br>The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers.<br><br>Please do not allow this Plan to be accepted. Any new plan should at least address the 3 points above. | programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Regarding storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket |

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| | | Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. At local scale, we have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option. |
| WRMP1013 | Fundamentally Southern Water's plan must be rejected. On so many counts it is wholly unacceptable.<br><br>I share with you a number of reasons for rejecting this plan. To be frank there are many reasons and I know you will receive many letters and emails exposing Southern Water's plan as being wholly unacceptable.<br><br>1 -Southern Water's plan commits us to paying for recycled effluent as the primary source of our drinking water every day of the year, year on year. Aside of the many reasons I shall draw to your attention later we shall all be committed to paying vast sums for a service that extracts water from effluent which includes raw sewage and water run-off into the recycling plant. There is no alternative or second option on offer.<br><br>2-There is no plan to abstract water from lower down the catchment area, there is no plan to capture fresh rainwater. Climate change predictions show that we are likely to encounter wetter winters. Quantity of rainfall predictions indicates sufficient rainfall to supply all our water needs if it were collected. No such plan exists to create more reservoir catchments. | Thank you for reviewing our rdWRMP24 and providing feedback. We respond to your points below.<br><br>1) We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding sustainable water supplies into the future means we need to look at all viable alternatives to the sources that have been traditionally used. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is being funded in the same way as any funding for new infrastructure and improvements on the water supply side of the business, which is averaged across water supply customers' bills across our region. As with all costs and charges to customers, funding for HWTWRP will be subject to approval by our economic regulator, Ofwat. We anticipate that Ofwat would spread the cost of construction and operation over the life of the Project once built, to reduce the impact on bills in any one year. HWTWRP is continuing to be developed and we currently estimate that the cost to each of our water supply customers would be approximately £2.50 a month over a 20-year period.<br><br>2) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable as a result of the reduction in abstraction licences on the whole river and groundwater system and potential impact on migratory fish. New reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan. A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |

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| | 3 – The Candover Drought Option should not be permitted to continue beyond 2030. The [redacted] river abstraction should be moved to nearer the tidal zone. Climate predictions indicate drier summers. Our rivers need a flow to sustain biodiversity and protect wildlife.<br><br>4 – it is incredulous that Southern Water would tanker in water from Norway should we have a drought. This shows a complete disregard, or perhaps deliberate intent, not to make use of our own rainfall. Water inevitably contains organisms. Mixing water from one country with our own, opens up the possibility of bringing in unwanted 'guests' which could devastate our own wildlife. Further altering the pH of our water could have deleterious effects on our own wildlife.<br><br>5 – Southern Water manipulate population figures and thus inflate water demand needs so they can dismiss using alternative schemes to provide fresh water for our needs on the grounds that these alternatives would be insufficient to meet demand. This way they wholly dismiss all plans to build more reservoirs to capture the plentiful supply of rainwater. They dismiss improvements to abstract river water from nearer the tidal zone when in wintertime there is plenty of water in the rivers and when abstraction would not threaten wildlife. They make a token gesture to improving<br><br>infrastructure to markedly reduce water leaks. That they dismiss all these options leads one to consider that their plan is primarily a means to 'feather their own nest' from a financial point of view. Their plans are so energy intensive and, as previously stated, commit them to using the high energy method 365 days of every year and we shall pay the price.<br><br>5 – It is of considerable concern that Southern Water would appear to be manipulating the Investment Model to prevent the selection of smaller more sustainable schemes until after 2030, in favour of continued use of drought permits on the Test and Itchen, and the selection of larger schemes which cannot be delivered until later, to make sure the Company get the solution they want selected, which delivers more guaranteed profits.<br><br>6 – The scheme is incredibly energy intense. To pump treated effluent up to Havant Thicket Reservoir and then transfer the water over to [redacted] some 40+ kilometres away will require considerable energy. As such this method has a very high carbon impact and will result in release of considerable greenhouse gases. This process will occur every day of the year, year on year, regardless of the rain that falls during the winter, regardless of the huge volume of water that flows from our rivers to the sea.<br><br>7 – Southern Water say they are committed to net zero by 2030 yet their scheme is probably one of the most energy demanding schemes that could be devised. | 3) It is our desire to avoid the use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the delivery of HWTWRP, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>4) Regarding the temporary option to ship in water from Norway (between 2031-2034), this option is no longer included in our plan.<br><br>5a) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>5b) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6). The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but to also add to wider environmental and societal benefit.<br><br>6) Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, |

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| | 8 – That Southern Water's plans to reduce water leakage are so poor is of grave concern. We pay for that lost water and they profit from that lost water! Their timescale to make improvements is wholly inadequate. Far too much water is leaked.<br><br>9 - It goes beyond crass stupidity that Southern Water plan to build on the old landfill site on Broadmarsh. Given their atrocious record of water leaks and deliberate sewage releases I have absolutely no faith that they can build on the landfill site without there being a calamity, if not a catastrophe. The potential for leakage of obnoxious substances is just too high a price to pay.<br><br>Anyone of the above points I draw to your attention should be sufficient to turn down Southern Water's plan. Collectively these points, and you will receive many others, conclusively shows that Southern Water's plan is absolutely and wholly unacceptable. It is a plan that ensures a high cash flow, daily return for Southern Water's stakeholders at our expense. Further, should it be accepted by yourselves, it sets a very dangerous precedent for future schemes. You have amongst other sound reasons for refusal such as scientific and financial, a moral obligation to refuse this plan. | in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>7) As WRMP24 options are constructed, our baseline emissions will evolve. This will increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>8) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>9) Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines. |

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| WRMP1014 | The referenced Management Plan is, I understand, now with DEFRA for approval/rejection due to its strategic implications. As part of the consultation process concerning Southern Water's proposal, I wish to object to this plan. I enclose a short summary of the reasons behind my objections and respectfully request you consider them when making your decision.<br><br>I am a registered voter in the East Hants constituency and as a customer of both Southern Water and Portsmouth Water I am impacted by the consequences of this proposal.<br><br>The enclosure replaces the one dated 3rd December which I mistakenly emailed yesterday, for which, once again, I apologise.<br><br>I am writing to object to the draft plan referenced above. I am a registered voter in the East Hants constituency and have been a customer of both Southern Water and Portsmouth Water for many decades and therefore qualified to comment.<br>For any plan or project to be approved, three criteria must be satisfied. First, the technical solution should be the optimum method of solving the problem for which it is designed - no more, no less - with minimum risk to the expected benefits. Second, the company implementing it should have form in delivering relevant projects in size and complexity, to time, budget and quality. Third, it should be the best risk-considered investment choice. On all three grounds this plan fails.<br>TECHNICAL SOLUTION<br>The proposed technical solution posits the addition of recycled waste water to fresh water in Havant Thicket Reservoir. The consequences of unforeseen cross-contamination of drinking water are not trivial given the huge populations potentially affected.<br>The water is then transferred through high value, hard access locations to where it is needed. This seems unnecessarily high risk, requiring additional investment and a perpetual drain on in-year costs. This solution also requires advanced techniques (for the UK in this context) for recycling effluent and therefore constitutes a high risk of financial overrun and technical failure. The recycling of effluent will take place on landfill. Given that the construction work will intrude into a contaminated landfill site there is a high risk of environmental degradation of the nearby coast.<br>This high emission, high carbon footprint solution seems to be oblivious of the UK's responsibility to reduce the effects of climate change and might cause the company to abandon its commitment to carbon neutrality by 2030. Other, more sustainable solutions which fit better with the constraints of climate change are, I'm sure, available and should be seriously considered. Indeed, the 100m litres of water extracted daily but never used due to leakage might be a place to start.<br>THE COMPANY<br>I can't see why Southern Water, given its poor record of failures and prosecutions for breaches of the rules governing water treatment, might behave differently with a critical project like this. Moreover, the regulatory framework for this industry appears to be so unfit for purpose that holding such a company to meaningful account seems unlikely. This therefore poses yet another risk to delivery of the expected benefits.<br>Given the funding and ownership business model for UK water, the | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note your concerns regarding the use of recycled water in Havant Thicket. Following reductions in the amount of water we can take from Rivers Test and Itchen and their associated aquifers, we need to find at least 166 million litres of water a day and with further restrictions on the amount of water we can take from the environment expected in the future, that number may rise. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is needed to help protect the Test and Itchen by reducing abstractions and providing a new water source for the county.<br><br>Water recycling creates a safe and sustainable supply of purified recycled water that, after being pumped into Havant Thicket Reservoir and taken again for further treatment to strict UK drinking water standards, would be sent into supply. Water recycling is already widely used around the world – in Australia, Singapore, the USA and Belgium. Southern Water is one of several water companies in the UK developing water recycling plants to create new sources supply for the future. Water recycling plants use advanced treatment techniques to turn treated wastewater into purified, recycled water that can be used as a source of water for drinking water supplies. The treatment process includes using special membranes in a process called reverse osmosis (where the membranes' perforations are more than 50,000 times smaller than the width of a human hair) and using ultraviolet light and hydrogen peroxide in a process called advanced oxidation. A Water Recycling Pilot Plant was set up at Portsmouth Harbour WTW Wastewater Treatment Works to test key elements of the water recycling treatment process. Initial results indicate that the water recycling technology effectively managed numerous different nutrients and metals. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. A detailed report will be published later in the year, with the results informing additional assessments including the Environmental Impact Assessment for the Project. For more information about water recycling please visit: www.southernwater.co.uk/water-recycling<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each |

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| | susceptibility of critical water industry companies to predatory behaviour through acquisition, (cf. Macquarie/Thames Water) appears also to present a risk.<br>RISK CONSIDERED INVESTMENT CHOICE.<br>In the end the consequences of the high risks (both low and high probability) will all be financial. Risks can either be avoided or hedged with contingency funding. In the case of this plan the huge financial commitment required to underwrite such an endeavour sits poorly with the economic state of the UK right now.<br>Given the risks, the novelty and the potential costs I believe this is not a measured and responsible investment for UK citizens. It seems to have all the hallmarks of a last-minute opportunistic piggyback on the excellent work that Portsmouth Water have had in train for many years.<br>CONCLUSION<br>Since DEFRA is charged with responsible decision making in UK citizens' interests, it should reject this plan and require Southern Water to resubmit proposals with a lower and more balanced risk profile, better sustainability and better value for money.<br>The assessment of this project will be a serious test for the leadership qualities of our parliamentarians, DEFRA and the regulator. They, I understand, have the power to prevent its further progress and have, I believe, been provided with the arguments to support such a move. | successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We have taken significant steps over the last 5 years to address past performance - please see Our Business Turnaround Plan \| Southern Water for details. |
| WRMP1015 | I have just found out that today is the last day of a public consultation I did not know about.<br><br>My gut instict screams out against my drinking water coming not from the purest source but going through a risk-fraught process of effluent cleansing. I'm sure it will all be fine, until something goes terribly wrong.<br><br>At this time when as a society we have to stand back and take stock of how we live on this planet and how we leave it for the future generation, surely the BLINDINGLY OBVIOUS TRUTH is that we have rainwater galore arriving sporadically and increasingly so. Surely we need to invest to harness this fantastic resource in ways that accomodate the erratic nature of its arriving.<br><br>RATHER than anally recycling effluent. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note your concerns regarding the use of recycled water in Havant Thicket. Following reductions in the amount of water we can take from Rivers Test and Itchen and their associated aquifers, we need to find at least 166 million litres of water a day and with further restrictions on the amount of water we can take from the environment expected in the future, that number may rise. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is needed to help protect the Test and Itchen by reducing abstractions and providing a new water source for the county.<br><br>Water recycling creates a safe and sustainable supply of purified recycled water that, after being pumped into Havant Thicket Reservoir and taken again for further treatment to strict UK drinking water standards, would be sent into supply. Water recycling is already widely used around the world – in Australia, Singapore, the USA and Belgium. Southern Water is one of |

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| | I have no faith in a company which pours untreated effluent into the seas, to provide safe drinking water.<br>There are I'm afraid, bound to be horrible mistakes.<br><br>I am anxious about the intelligence and morality of this plan and the company and others with blinkered similar money making primary goal setting. | several water companies in the UK developing water recycling plants to create new sources supply for the future. Water recycling plants use advanced treatment techniques to turn treated wastewater into purified, recycled water that can be used as a source of water for drinking water supplies. The treatment process includes using special membranes in a process called reverse osmosis (where the membranes' perforations are more than 50,000 times smaller than the width of a human hair) and using ultraviolet light and hydrogen peroxide in a process called advanced oxidation. A Water Recycling Pilot Plant was set up at Portsmouth Harbour WTW to test key elements of the water recycling treatment process. Initial results indicate that the water recycling technology effectively managed numerous different nutrients and metals. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. A detailed report will be published later in the year, with the results informing additional assessments including the Environmental Impact Assessment for the Project. For more information about water recycling please visit: www.southernwater.co.uk/water-recycling<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP1016 | In response to the Consultation on the Southern Water revised draft Water Resources Management Plan (WRMP) 2024, I am writing to object strongly to this revised WRMP for the following reasons:<br><br>As a Southern Water and Portsmouth Water customer I am very concerned about the significant costs to consumers over many years, of the proposed Water Treatment & Water Recycling (WT&WR) scheme in the WRMP, when other more environmentally-friendly schemes could provide increased capacity in the water supply at less cost. The proposed WT&WR scheme would incur significant permanent running and maintenance costs in addition to the very high initial capital outlay, which would eventually fall to customers to meet. Alternative more cost-effective schemes could be implemented to provide increased supply capacity to meet demand, and should be pursued instead.<br>The WT&WR scheme would have a serious impact on the environment, resulting in high greenhouse gas emissions. With an abundance of rainfall, particularly during winter, and with greater rainfall predicted for the future due to climate change, it should not be necessary to rely on a very costly scheme using recycled effluent being fed into and stored in the new Havant Thicket Reservoir now under construction. When such high amounts of rainfall are freely available, use of water storage/extraction solutions with less environmental impact and at lower cost are feasible, such as the use of aquifers for additional storage, and increasing current borehole extraction capacity. These and other potential solutions should be pursued instead. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We also need to look at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan. Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted |

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| | Priority should be given to providing further water storage capacity, and if water extraction is still necessary from rivers, protection of the highly-valued and environmentally important Hampshire chalk streams could be achieved by implementing schemes to limit any water extraction to points much lower downstream, near the tidal limits.<br>Higher priority and more resources should be directed by Southern Water and Portsmouth Water to improving supply infrastructure to reduce significantly the currently very high water supply system leakage rates, in a much shorter timescale.<br>With abundant rainfall available for collection and storage in this country, it should not be necessary to bring in water supplies by tanker from Norway in times of drought, as proposed in Southern Water's revised draft WRMP. Our country would be more self-sufficient with the implementation of alternative water storage/extraction schemes other than importing water from Norway.<br><br>For the above reasons, I urge the Secretary of State to reject the Southern Water revised draft Water Resources Management Plan (WRMP) 2024. Southern Water should be called on to assess and propose alternative water storage and supply schemes that would be more environmentally-friendly and less costly to customers than the proposed Water Treatment & Water Recycling Project. | however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of 'serious water stress' (see Water_stressed_areas___final_classification_2021.odt). Water stress is defined as areas where household demand is a high proportion of effective rainfall that is available to meet that demand. It applies to both public water supplies and the natural environment, and takes account of climate change, growth and the need for greater drought resilience of public water supplies. These supplies are also under pressure from reductions in abstraction to make them more environmentally sustainable. The Hampshire Water Transfer and Water Recycling Project (HWTWRP) will address these demands by purifying and re-using water that has already been used for public supply, rather than taking more water from the environment during times of low flows.<br><br>The temporary option to ship in water from Norway (between 2031-2034), is no longer included in our plan.<br><br>There will be further opportunity to comment on the HWTWRP during its next consultation and you can register to be kept up to date here; Register - Hampshire Water Transfer and Water Recycling Project. |

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| WRMP1017 | I am writing to make my representations on the above Plan on which comments have been invited. I write my comments having considerable experience in water resource planning, having been the Engineering Director at Portsmouth Water between 1997 and 2012. IDuring that time I was responsible for, as well as being heavily involved in the preparation of several of the Company's Water Resources Plans. Those plans together with the foresight of my predecessors have formed the foundation upon which the Company is now developing Havant Thicket which will support the necessary reductions in groundwater abstraction in various catchments.<br><br>My principal concerns with regard to Southern Water's revised plan are as follows:-<br><br>The Plan appears to be dependent upon the recycling of treated waste water which, due to it's high energy requirements, will not be sustainable for the environment nor the public purse too. SWS should be developing solutions which are much more sustainable. Whilst it is laudable that the Company should be reducing it's abstractions from important rivers in Hampshire, there is no reason whatsoever why such abstractions cannot be re-sited to enable the current water treatment works to be retained. In addition there is and will continue to be a massive quantity of high quality water being discharged to estuaries during the winter periods which should be stored elsewhere for summer use. My colleagues and I urged them many times during discussions at WRSE twenty years ago, to consider such proposals but they never appeared to be taken seriously<br>SWS leakage rates equate in total to a loss of more than 100Ml/d and this needs to be reduced by a significant increase in their mains renewal programme. Their current rate of mains renewal equates to a replacement rate of 1 in 1000 years which is totally inadequate when the design life of most water mains is 120 years.<br>SWS has a poor record of maintaining it's wastewater network and treatment systems which cannot be relied upon to discharge into Havant Thicket Reservoir, Langstone Harbour and the Solent. I do not believe that they can be relied upon to provide water of sufficient quality to discharge to the reservoir which will normally be receiving spring water from Havant and Bedhampton. There will be far too many risks to deteriorating water quality in the reservoir if this proposal is adopted.<br>SWS needs to do much more to reduce it's environmental credentials by moving abstractions further downstream where they cause less environmental impact, developing local storage solutions, either above or below ground, and avoiding long pumped pipelines. They need to develop low environmental impact solutions not effluent recycling and sea tanker solutions which have very high environmental impacts.<br><br>Having promoted the development of Havant Thicket Reservoir as a long-term solution for meeting the future need of Portsmouth Waters' customers during my time at the Company, I do not believe that the majority of those customers would be willing to support the development of recycling of effluent from [redacted] WWTW. They would not wish it to form a principal part of their public water supply and more especially for it to be developed in order to supply the | Thank you for reviewing our rdWRMP24 and providing feedback<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Regarding the quantification of cost, we calculate capital, operational and carbon costs for each option. These are presented in the Water Resources Planning tables that accompany our plan and are scrutinised by Ofwat as part of our Business Plan.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Our capital programmes are delivered in line with our regulatory commitments and operational needs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is |

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| | Southampton and southern Hampshire area when a solution could and should be found elsewhere in Hampshire.<br><br>The schemes proposed will have not only a high environmental cost but also a very high financial cost which will inevitably will land in the laps of customers of both SWS and PWC.<br><br>Southern Water need to be directed to look again at their Plans and come up with a much more robust and sustainable plan not for the next 20 years but for many more beyond. | too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We consider all options, regardless of size, as part of our options appraisal process. In a number of cases, we have considered different capacity variants of the same option. For example, in the case of HWTWRP, we considered water recycling plants ranging in size from 15Ml/d to 60Ml/d. Similarly, the desalination plans we have considered in the Central and Eastern areas vary in size from 10Ml/d to 40Ml/d. A number of these plant can be built in a modular fashion i.e. a smaller plant can be built initially but expanded later as the need for water increases. The size of the scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>We have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

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| | | Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Regarding the environmental impacts of sea tankering, this option is no longer included in our plan.<br><br>As part of our role to protect and enhance the environment, we are committed to reducing carbon. You can find out more about our carbon policy here: https://www.southernwater.co.uk/about-us/our-policies-and-standards/carbon/.<br><br>We aim to deliver net zero carbon by 2050 and we are expanding our carbon accounting processes to measure the impact of our capital delivery programme. We recognise that carbon may be significant from this option however, due to the required transport methods and temporary nature of the option. We will continue to assess the carbon footprint of this option and balance it against the environmental benefit of protecting the River Test in times of drought. Other environmental impacts may accrue from the laying of a non-permanent pipeline between Southampton Docks and Test Surface Water WSW. These impacts will be fully assessed as part of the planning applications needed for this infrastructure.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP1018 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water's plans to recycle sewage into drinking water and call upon Defra to reject Southern Water's Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the |

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| | SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water's customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, they risk damaging the adjacent nature reserve, Farlington Marshes and exacerbating the known risk of leaching into Langstone Harbour.<br>We believe that the funding mechanism for water companies needs to be changed so they are no longer incentivised to deliver infrastructure-heavy projects but instead work with sustainable solutions which help to mitigate climate change and biodiversity reduction. | proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| WRMP1019 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water’s plans to recycle sewage into drinking water and call upon Defra to reject Southern Water’s Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit.<br>SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water’s customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, they risk damaging the adjacent nature reserve, Farlington Marshes and exacerbating the known risk of leaching into Langstone Harbour. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID) gated process. |

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| WRMP1020 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water's plans to recycle sewage into drinking water and call upon Defra to reject Southern Water's Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit.<br>SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water's customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, they risk damaging the adjacent nature reserve, Farlington Marshes and exacerbating the known risk of leaching into Langstone Harbour.<br>We believe that the funding mechanism for water companies needs to be changed so they are no longer incentivised to deliver infrastructure-heavy projects but instead work with sustainable solutions which help to mitigate climate change and biodiversity reduction. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |

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| WRMP1021 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water’s plans to recycle sewage into drinking water and call upon Defra to reject Southern Water’s Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, |

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| WRMP1022 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water's plans to recycle sewage into drinking water and call upon Defra to reject Southern Water's Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit.<br>SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water's customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a |

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| WRMP1023 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water's plans to recycle sewage into drinking water and call upon Defra to reject Southern Water's Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit.<br>SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water's customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, they risk damaging the adjacent nature reserve, Farlington Marshes and exacerbating the known risk of leaching into Langstone Harbour.<br>We believe that the funding mechanism for water companies needs to be changed so they are no longer incentivised to deliver infrastructure-heavy projects but instead work with sustainable solutions which help to mitigate climate change and biodiversity reduction. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of |

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| | | the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. |

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| WRMP1024 | We, the Liberal Democrat Group on Havant Borough Council, oppose Southern Water's plans to recycle sewage into drinking water and call upon Defra to reject Southern Water's Draft WRMP on the following grounds:<br>Water Recycling is very energy hungry when compared to established systems for delivering water supplies such as reservoirs.<br>Southern Water have not fully explored other, cheaper, and more sustainable ways of providing a reliable supply of drinking water to the South of England. They should be focusing on alternatives such as aquifer recharging and river extraction close to the tidal limit.<br>SW should prioritise reduction of extraction from the chalk streams, rather than continuing to damage our globally important chalk stream environment while they deliver a technologically complex long-term project which the public do not want.<br>Southern Water's customers will pay for this project, which faces significant public opposition, through long-term increases to their water bills.<br>Southern Water have demonstrated many times that they cannot operate their existing infrastructure. The public should not be expected to trust them to produce drinking water using reverse osmosis with its numerous technical challenges.<br>Southern Water plan to build a reverse osmosis plant on a former landfill site within Havant Borough. When we questioned their choice of site they showed no understanding of the challenges of safe construction on landfill. If anything goes wrong during and after construction, they risk damaging the adjacent nature reserve, Farlington Marshes and exacerbating the known risk of leaching into Langstone Harbour.<br>We believe that the funding mechanism for water companies needs to be changed so they are no longer incentivised to deliver infrastructure-heavy projects but instead work with sustainable solutions which help to mitigate climate change and biodiversity reduction. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Our Water Resource Management Plan not only has to look at our water needs for the next 5 years but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Environmental sustainability is a key criterion in our options appraisal process alongside additional factors such as volume of water, climate change, environmental impact. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>The Havant Water Recycling Treatment Plant (HWTWRP) scheme is designed to provide water resources during severe and extreme droughts, when natural groundwater and river water has been depleted due to limited rainfall. It will help to protect natural chalk streams by allowing us and Portsmouth Water to reduce our abstraction impacts on these unique habitats across East Hampshire and West Sussex.<br><br>The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |

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| | | We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water.<br><br>SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. |
| WRMP1025 | I was a [redacted] for many years and represented [redacted] from its inception.<br><br>I am deeply concerned by the way in which the plans have been altered by Southern Water. There needs to be more concentration on sustainable solutions that work with Climate change and put the Environment before profit.<br><br>I am particularly concerned about the risks in the Havant proposal on the development of a sewage recycling facility on a landfill in Havant. The large internal shafts through 13 ft of landfill waste brings risks to local aquifers and to the Solent. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Environmental sustainability is a key criterion in our options appraisal process which we carry out when we update our plan every 5 years. Capital, operational and carbon cost are sone of the factors considered in the options appraisal process but we do consider others. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. |

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| | Southern Water needs to concentrate on repairing and controlling leakages and installing solutions, such as underground storage aquifers for winter rainfall. I understand that they are, at present, losing 100 million litres of water a day through leakages.<br><br>The public is very uneasy regarding recycled drinking water and there is also unease regarding possible contamination of the Havant Reservoir when water from recycling plants is pumped into it.<br><br>The scheme for importing water by tanker from Norway at huge expense, at times of drought, with the need for the water to be treated because it has a different chemical make-up, would be laughable ,if it was not being seriously considered.<br><br>There is also a concentration on hugely expensive, and anti environmental, plans, such as the recycling of water from Havant Thicket to [redacted] , which would have a high carbon impact and green gas emissions..<br><br>There was never a real reason given for abandonment of the desalination plant near Southampton.<br><br>There are so many serious implications here that I would ask for permission for the thern Water Plan to be refused and that a better , more environmental and sustainable plan be drawn up as a matter of urgency. | Ofwat regulates the amount of profit that water companies can make which for the next 5 years cannot exceed 4.03%.<br><br>SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>No untreated wastewater will enter Havant Thicket reservoir. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Regarding the viability of sea tankering, this option is no longer included in our plan.<br><br>We acknowledge that water recycling will use more energy than conventional sources of supply. However, these conventional sources are no longer available to us as they once were due to WINEP investigation driven license changes to achieve sustainable abstraction. As with HWTWRP, this has necessitated investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain |

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| | | operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We submitted our detailed assessment of the desalination option on the Southampton coast to RAPID in 2021. We had recommended removal of the option primarily due to the potential environment impacts. RAPID agreed with our assessment. The assessment of our submission by RAPID is available on Ofwat's website https://www.ofwat.gov.uk/wp-content/uploads/2022/03/Strategic-regional-water-resource-solutions-accelerated-gate-two-final-decision-for-Desalination.pdf |
| WRMP1026 | I have lived in Horndean and Clanfield for almost 50 years, with our family being customers of Portsmouth Water (for water supply) and Southern Water (for sewage disposal). Portsmouth Water has been forward looking in planning a reservoir at Havant Thicket to provide enough water, sustainably sourced, for its future customers. Additionally it will be a wonderful amenity for nature and the local community, which supports it. However, I am strongly opposed to Southern Water's revised draft Water Resources Management Plan, which puts the whole project at risk. Southern Water should not be planning to poach from Portsmouth Water. Instead of endangering the spring fed reservoir with the addition of recycled effluent, Southern Water should be considering far cheaper and more sustainable solutions suggested below in solving the problem of future water shortfall for Southampton and Winchester.<br>Southern Water should reduce leakages. At present more than 100 million litres of water is lost every day with 3% of what Southern Water takes from the environment lost before reaching the treatment works and a further 19% lost in leakage in the distribution network. Therefore a faster programme of renewing water mains to replace the ageing pipe network should be their priority for increasing the amount of water they have to distribute.<br>Southern Water cannot be trusted with new complex technology for advanced effluent recycling (untested in the UK for this purpose). Southern Water has a very poor track record of treatment plant and pumping station failures, with many prosecutions for pollution incidents and failure to take prompt action to solve problems. This would mean a high risk of pollution not only to the reservoir at Havant but also considerable environmental damage to Langstone Harbour, an important nature reserve, and also to the Solent.<br>Southern Water should be considering more sustainable solutions rather than planning a £1.2 billion scheme to recycle treated waste water to store in Havant Thicket Reservoir and then transport much of it many miles to where it's needed. Due to climate change, winter rainfall, is predicted to increase. Therefore instead of recycling waste water, storing water from rainfall in reservoirs and confined aquifers for use at drier times of year would be cheaper and more sustainable. Also more of these schemes would help reduce flooding. At present only 1% of rainfall is collected in the UK, which is extremely wasteful. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations. Should you wish to participate in future consultations on the Hampshire Water Transfer and Water Recycling Project (HWTWRP), please visit our dedicated webpage Hampshire Water Transfer And Recycling Project<br><br>Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. It should be noted however that these will be in addition to, rather than instead of, the HWTWRP with a greater need for new water resources driven by the requirement to reduce abstraction from rivers and groundwater as part of the government's 25-year Environment Improvement Plan.<br><br>A Chalk Managed Aquifer Recharge (MAR) feasibility trial is also being considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | To fulfil their commitment to be carbon neutral by 2030 Sothern Water should be developing strategies now to protect the environment. River catchments can be better protected if river abstractions are moved closer to the tidal limit, leaving much of a river in a natural state.<br>Storage of water needs to be developed as close as possible to where the water is required so that long, expensive and energy high pipelines, which damage countryside and wildlife are not needed. Southern Water's scheme will cost more than £3 million a year, with pumping and treatment required every day despite the effluent recycling scheme was chosen to be just a drought resource.<br>It is astonishing that during a time of climate emergency that Southern Water has selected schemes with the highest carbon footprint and emissions. The Hampshire and Littlehampton effluent schemes have the highest negative environmental impact score of any of the considered options. The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transferring of water from Norway by tanker, which is to be used as an interim solution and indeed that would have an unacceptably high cost and environmental impact.<br>There are major risks from developing an effluent recycling plant on landfill. In particular there is the risk of contamination to the coastal environment. The construction of large tunnel shafts and hundreds of piles through a 13m deep contaminated landfill waste site into the underlying chalk aquifer which is adjacent to Langstone Harbour poses a very high contamination risk.<br>The Hampshire effluent recycling scheme will deliver a profit of about £45 million to Southern Water. This has undoubtedly been a factor in their choice of this scheme. This sort of profiteering paid for by customers is unacceptable as would be the cost of servicing the massive debt created. This shows that Defra needs to change the water industry funding mechanism to stop incentivising expensive infrastructure heavy solutions but encourage the development of more sustainable solutions that work with climate change.<br>There has been inadequate publicity and public consultation about Southern Water's plan. All Southern Water and Portsmouth Water customers should have been informed by letter that there could be a major change to their water supply under this scheme. They were not informed. In our area our Green District Councillor raised awareness but elsewhere little is known about what is planned and therefore they have not had the chance to give Defra their views. Research has shown that customers prefer more natural and sustainable solutions but Southern Water have taken no notice. | this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and as a result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>With regard to funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. We have received 1,176 responses as part of rdWRMP24 consultation. |
| WRMP1027 | Dear Defra,<br><br>I read with concern Southern Waters revised WRMP 24 revised plan and unfortunately note that, regarding building an effluent recycling plant at [redacted], nothing has changed.<br><br>I am unable to comment on the proposals that SWA have to supply other areas from sources other than the new Havant Thicket reservoir except to conclude that estimates of the likely demand in 50 years time ,are highly speculative. Plans should be realistic and limited to the Next 10 years.<br><br>Why does Southern Water want to build [redacted] Waste Water Recycling Plant.? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We also have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |

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| | If SWA had sufficient winter storage and managed leakage, consecutive dry winters would not be a problem.<br><br>The problem that Southern Water has, is the limit of abstractions from the Rivers Itchen and Test. Should for example flow in the Itchen fall below 194M/ltrs/day for EA environmental reasons, abstraction must stop.<br><br>A possible solution is to capture some , say 50% of this flow just before it gets into the sea and return it back into the Treatment Plants then,River (or aquifer) higher up stream.<br><br>{A sheet piled curtain wall and a variable height weir may be required to prevent salt water infiltration and of course the necessary pumps and pipeline.}<br><br>The construction and energy and running costs should be a fraction of those of the [redacted] proposal because the distances are so much shorter.<br><br>Currently Portsmouth Water can supply 15M/lt/day to Southern Water to the West .and can supply up to a further 75M lt/day when Havant Thicket Reservoir is completed without the need for costly recycled waste water from [redacted].<br><br>Now let us consider the [redacted] proposed recycling plant<br><br>I was fortunate to attend a recent webinar by Dr Marc Pichou who explained the reverse osmosis process very well.<br><br>In countries where water is in short supply, recycling can no doubt provide a solution but it is clearly technically very demanding, requires<br><br>disinfectant(hydrogen peroxide) and other chemicals and lots of energy. In addition he says plants have to operate at least at 30% of capacity 24/7 whether needed or not!<br><br>The [redacted] plant would need to process a minimum flow rate of 30M/ltr/day!!<br><br>How many successful WWRP are operating in the UK at present?<br><br>The site proposed is a former tip and is adjacent to the environmentally sensitive Langstone Harbour. Avoiding contamination will prove difficult and expensive.<br><br>Why are we here?<br><br>One only has to look at recent rain fall figures to conclude that there are no shortages of water resources on this part of the South Coast. | Regarding moving abstraction points closer to the sea, we have considered such options. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. They do inevitably have a higher financial and energy cost than conventional supply sources. These sources are however no longer available to us. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of ‘serious water stress’, see here. We are aiming to reduce PCC to 110l/h/d under dry year conditions by 2045. This is 5 years ahead of the 2050 target date set by the Government. We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector. If needed, we will modify our approach and adopt new technology to achieve greater demand savings and/or to achieve them earlier. |

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| | The problem is caused by the mismanagement of the existing resources in the area.<br><br>More winter rainfall needs to be captured and stored in aquifers and reservoirs. Less water needs to be lost or wasted through leakage.<br><br>Demand needs to be controlled.<br><br>Expensive clean water must not be allowed to leak out of the pipework.<br><br>Currently 19% of expensive processed water, leaks from the SWA distribution system!<br><br>More consideration needs to be applied to PRV pressure control of the distribution network particularly at night.<br><br>At least 1.0 % of the network needs replacing every year just to achieve the average age of pipework below 100 years!!!<br><br>I note with interest that SWA blames its recent increase in leakage figures on COVID!!!<br><br>To cope with future population growth, more rain water needs to be collected locally and used where high quality drinking water is not required.<br><br>( This will reduce demand but may need to be a planning issue for new developments.)<br>By way of introduction I am a retired Chartered Civil Engineer and have worked for water companies.<br><br>I understand the need for investment in the Water Industry( which has given me a good living,) but I fear on this occasion Southern Waters Proposals are more in the interests of its investors, than its customers.<br><br>What ever plans are finally approved by Defra, Southern Water will inevitably use them to justify very substantial customer price rises, when negotiating with OFWaT<br><br>Were the price rises awarded in the past used to invest properly in SWA infra structure? Judging by their recent failures, I think not!!<br><br>I continue to support the Havant Thicket Reservoir proposal and the supply of surplus Spring water to SWA.<br><br>We can do without extravagant Waste Water recycling. | For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. |
| WRMP1030 | Please could you raise objections for the Southern Water Proposals.<br><br>My greatest concern is for the use of recycled sewage effluent to top up our water supply and building a treatment plant in my area. | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | Fixing the leaks and collecting rainwater would supply us with the water we need. Please intervene with this unacceptable proposal. | Your concern about the use of recycled water in Havant Thicket has been noted. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives. |
| WRMP1031 | The original plans for the reservoir said it would be filled by spring water. So why is this changing? If it is a matter of time - many of us have waited years for this reservoir but the majority of us would rather wait longer for it to fill naturally than to have this unpleasant, very extensive and expensive, plan to involve S Water.<br><br>These proposals would cost £3M a year to treat and pump water to the reservoir. That is crazy and unless all the share-holders of Southern Water say they personally will give up their profits from S Water for at least 10 ears, then this plan should be rejected. Even if they paid- it is an unacceptable plan.<br><br>I swim in the harbour regularly. More treatment of sewage at [redacted] will doubtless increase their discharge of effluent into the harbour. They should solve that problem first as well as the piping costs BEFORE any thought of having any involvemnt with the new reservoir. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>With regard to planning consent for Havant Thicket, Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>The HTR TCPA is for raw water, but our DCO will change the operational use of the reservoir so that it can store the mix of water that will be used with the HWTWRP. The Rapid G1 and G2 submissions are not related to the planning process.<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply. We note the objection to the use of recycled water in Havant Thicket. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017.<br><br>A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. |

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| WRMP1032 | I am responding to Southern Water Services' (SWS) consultation of its Water Resource Management Plan (WRMP).<br><br>I have found the consultation documents opaque and it is my view that far greater transparency of information is required. It is difficult to understand SWS's reasoning for its long delays in finding alternative supplies of water to stop it abstracting from sensitive chalk streams and aquifers.<br><br>In particular:<br><br>1. There is a lack of transparency in the consultation as the documents lack high-level figures to explain the way in which predictions on supply, demand and deficit are made.<br><br>2. There is a lack of real commitment to long-term projects needed to ensure environmental protection from abstraction. For instance, the Water Recycling schemes and the use of the Havant Thicket Reservoir need to be brought forward with tighter time-frames. Southern Water should not be relying on taking water from the rivers and the aquifer.<br><br>3. There are no long-term “Plan B’s” in case the recycling and reservoir options are delayed or abandoned. This means huge risk to important chalk streams and their wild fish populations.<br><br>4. The plan is not consistent with promises made by the water company to the Environment Agency in 2018 to use “all best endeavours” to bring forward long-term water resource schemes to avoid the use of damaging drought permits and orders.<br><br>5. The environmental assessments, which describe the impact of the water resource schemes, are full of errors. They do not properly consider the impacts of increased abstraction on the chalk streams and their aquifers.<br><br>6. The environmental assessments do not deal with the consequences of the Environment Agency’s conclusions that there is a salmon “metapopulation” of fish in the southern chalk streams.<br><br>It is my view that the plan fails on all fronts: clarity, deliverability, environmental assessment and environmental protection.<br><br>I urge you to consider the unacceptable and avoidable environmental impact these plans will have if not revised.<br>This section is editable for you to add your own sign-off and personalise your email, doing so will increase its impact. Tell Southern Water about how their plans to over-abstract water from rivers in southern | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or ‘the Act’ (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br>"https://waterresources.southernwater.co.uk/find-out-more/"<br>1) As part of our 2018 agreement with the Environment Agency under section 20 of the Water Industry Act 1991, we remain committed to using all best endeavours to deliver a long-term solution in Hampshire as soon as possible.<br>2) Our plan is adaptive in nature. This means that we can switch schemes depending on the scale of population growth, climate change impacts and the amount of reduction in the volume of water we get from our existing sources. We do consider the risks in delivering the schemes selected in our plan and try to mitigate them as much as we can.<br>3) We acknowledge your support for the implementation of HWTWRP in order to protect the Chalk streams. We have employed and continue to employ all best endeavours to deliver a large strategic scheme in Hampshire to prevent the use of drought permits/ orders. Initially the strategic scheme was to be a desalination plant on the Solent. However, through the Regulatory Alliance to Progress Infrastructure Development (RAPID) gated process, we undertook an options appraisal process that investigated alternative options. We considered a range of environmental and planning criteria, alongside the delivery of our legal obligations to rank the different options. These also included: alternative water recycling schemes; a transfer from the West Country and a direct pipeline from Havant Thicket reservoir to our Hampshire supply area. We found the desalination plant was the lowest ranked of the options, so we are not progressing it any further. This decision was supported by our regulators. We continued investigating options for a water recycling scheme and pipeline and this led to the development of the Hampshire Water Transfer and Water Recycling Project (HWTWRP).<br>4) As the environmental regulators of the water industry, the Environment Agency and Natural England have provided detailed comments regarding the Environmental Assessments for the WRMP. Work is being undertaken by our consultants WSP to address these comments and make any necessary changes to ensure that the assessments align with regulatory requirements. |

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| | | 5) Please see answer to 5). |
| WRMP1033 | I read with concern Southern Waters revised WRMP 24 revised plan and unfortunately note that, regarding building an effluent recycling plant at [redacted] [redacted], nothing has changed. I am unable to comment on the proposals that SWA have to supply other areas from sources other than the new Havant Thicket reservoir except to conclude that estimates of the likely demand in 50 years time ,are highly speculative. Plans should be realistic and limited to the Next 10 years.<br><br>Why does Southern Water want to build [redacted] Waste Water Recycling Plant.?<br><br>If SWA had sufficient winter storage and managed leakage, consecutive dry winters would not be a problem.<br><br>The problem that Southern Water has, is the limit of abstractions from the Rivers Itchen and Test. Should for example flow in the Itchen fall below 194M/ltrs/day for EA environmental reasons, abstraction must stop.<br>A possible solution is to capture some , say 50% of this flow just before it gets into the sea and return it back into the Treatment Plants then,River (or aquifer) higher up stream.<br>{A sheet piled curtain wall and a variable height weir may be required to prevent salt water infiltration and of course the necessary pumps and pipeline.}<br>The construction and energy and running costs should be a fraction of those of the [redacted] proposal because the distances are so much shorter.<br>Currently Portsmouth Water can supply 15M/lt/day to Southern Water to the West .and can supply up to a further 75M lt/day when Havant Thicket Reservoir is completed without the need for costly recycled waste water from [redacted].<br><br>Now let us consider the [redacted] proposed recycling plant<br>I was fortunate to attend a recent webinar by Dr Marc Pichou who explained the reverse osmosis process very well.<br>In countries where water is in short supply, recycling can no doubt provide a solution but it is clearly technically very demanding, requires<br>disinfectant(hydrogen peroxide) and other chemicals and lots of energy. In addition he says plants have to operate at least at 30% of capacity 24/7 whether needed or not!<br>The [redacted] plant would need to process a minimum flow rate of 30M/ltr/day!!<br><br>How many successful WWRP are operating in the UK at present?<br>The site proposed is a former tip and is adjacent to the environmentally sensitive Langstone Harbour. Avoiding contamination will prove difficult and expensive.<br>Why are we here?<br>One only has to look at recent rain fall figures to conclude that there are no shortages of water resources on this part of the South Coast.<br>The problem is caused by the mismanagement of the existing resources in the area. | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket is noted.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. Regarding moving abstraction points closer to the sea, we have considered such options. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. Supplementing the reservoir with purified recycled water will create a new sustainable source of supply.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the |

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| | More winter rainfall needs to be captured and stored in aquifers and reservoirs. Less water needs to be lost or wasted through leakage.<br>Demand needs to be controlled.<br>Expensive clean water must not be allowed to leak out of the pipework.<br>Currently 19% of expensive processed water, leaks from the SWA distribution system!<br>More consideration needs to be applied to PRV pressure control of the distribution network particularly at night.<br>At least 1.0 % of the network needs replacing every year just to achieve the average age of pipework below 100 years!!!<br>I note with interest that SWA blames its recent increase in leakage figures on COVID!!!<br>To cope with future population growth, more rain water needs to be collected locally and used where high quality drinking water is not required.<br>( This will reduce demand but may need to be a planning issue for new developments.)<br><br>By way of introduction I am a retired Chartered Civil Engineer and from [redacted] have worked for Both Southern and Portsmouth Water, the partnership who are putting the WWTP plan together.<br>I was a [redacted] for the construction of [redacted] Waste Treatment Plant, The [redacted] Treatment Plant and Contracts Engineer for Portsmouth waters mains renewal programme.<br>I understand the need for investment in the Water Industry( which has given me a good living,) but I fear on this occasion Southern Waters Proposals are more in the interests of its investors, than its customers.<br>What ever plans are finally approved by Defra, Southern Water will inevitably use them to justify very substantial customer price rises, when negotiating with OFWaT<br>Were the price rises awarded in the past used to invest properly in SWA infra structure?<br>Judging by their recent failures, I think not!!<br>I continue to support the Havant Thicket Reservoir proposal and the supply of surplus Spring water to SWA.<br>We can do without extravagant Waste Water recycling. | landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>We consider that current water mains have an average asset life of approximately 100 years. If 0.5% of mains are renewed each year this would mean that, on average, a main is expected to last for 200 years. There are different views in the water sector on the appropriate rate of mains renewal and the amount of investment needed on asset health overall. Our economic regulator Ofwat in its December 2024 final determinations published a roadmap for enhancing understanding of asset health in the sector https://www.ofwat.gov.uk/publication/pr24-final-determinations-roadmap-for-enhancing-asset-health-understanding-in-the-water-sector It is too early to say what the outcome of that work will be in relation to future rates of mains renewal.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |
| WRMP1034 | To DEFRA<br>As a resident of Havant Borough, I have various concerns about the SW proposals for an effluent recycling plant being built to provide the Havant reservoir with water. More sustainable, | Thank you for reviewing our rdWRMP24 and providing feedback. |

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| | environmentally friendly options which work with predicted climate changes should have been more robustly assessed and included in the SW revised draft plan.<br>Given likely spiralling costs which always occur with this type of construction plan, likely programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short lifespan, the Hampshire effluent recycling scheme cannot represent best value for customers.<br>The selection of effluent recycling via Havant Thicket and transfer 40km to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions. In addition, the SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme.<br>Moving abstractions to the lower catchment of rivers should be prioritised for investigation as a sustainable and environmentally friendly solution across the region.<br>Instead of the effluent recycling plant, SW should start immediate work on delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control. The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex should be prioritised to establish the yield they could provide. This is essential and should be funded urgently so that these schemes can be included as feasible options. Also, SW need to work on the capture of more winter rain for use in dry summers.<br>No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme; a scheme previously indicated to be feasible with sites that are closer to where the water is needed.<br>Multiple cheaper and more sustainable schemes than effluent recycling have been rejected by SW because they 'cannot be delivered in time', according to SW. Presumably, this means by 2030. Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are only looking at one option. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br><br>Also, an option proposed by SW for when there is a drought, was to tanker-in water from Norway. Bringing water from Norway cannot be accepted as a credible drought plan under any circumstances. The economic and detrimental environmental impacts make the suggestion laughable.<br>I request that you reject the SW proposal and instruct them to construct a plan that is more sustainable, environmentally friendly and better value for their customers.<br>Thank you for taking the time to consider my response. | The Havant Thicket Reservoir was selected in WRMP19, has been through a separate consultation process and we are progressing with its delivery, so this scheme is not new to WRMP24. The cost for the Havant Thicket Reservoir is included in the Water Resources Planning tables that accompany our plan. Annex 12 to our rdWRMP24 listed all options considered for WRMP24, including those that were not taken forward for a more detailed assessment (Section 3 of Annex 12).<br><br>We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible.<br><br>We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. Sea tankering from Norway is no longer included in our plan.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction |

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| | | licences on the whole river and groundwater system and because of the impact on migratory fish. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan.<br><br>Using the reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option. |

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| | | There are regulatory and statutory requirements for public water supply to be more resilient to droughts and to meet additional demands associated with growth and development. The HWTWRP will address these demands by re-using water that has already been used for public supply, rather than taking more water from the environment during times of low flows. The temporary option to ship in water from Norway (between 2031-2034), is no longer included in our plan. |
| WRMP1035 | I write to object to Southern Water's latest options for converting Sewage to drinking water at our new Havant reservoir. I believe that Southern water suffer from a lack of clear sightedness and are most definitely not listening to their client base. It is utterly clear that they are scrambling to catch up from a lack of investment and hence updating of resources. They have allowed the extremely weak leadership and management by OFWAT to give them space to under-perform and attract ridiculous fines. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We thank you for your engagement and feedback with our rdWRMP24 consultation. Your objection to the use of recycled water in Havant Thicket has been noted. Our website will provide details on our WRMP24 and, going forward, our WRMP29. |
| WRMP1036 | Good Day Defra<br><br>With regard to the Southern Water revised draft Water Resources Management Plan by Southern Water -<br><br>I strongly object, so am emailing you as a 79 year old drinking Portsmouth Water all my life and Southern Water 'dealing with waste water'<br><br>I am horrified to find out that Southern Water propose to recycle effluent with Portsmouth Water and store in Havant Thicket Reservoir which is a new reservoir created originally by Portsmouth Water. Since Southern Water contaminated our seas which we can no longer swim in and now they propose for us to drink recycled water in the future !<br><br>This is a very devious plan they trying to get through without sharing this plan with the local population!<br><br>Every day Southern Water waste so much 'leaked' rain water , it should be stored in aquifers there would then be no need for recyling if managed correctly !<br><br>Apparently 3 winter storage reservoirs could be built for the cost of the whole effluent recycling scheme.<br><br>and to tanker water from Norway is outrageous with extra costs of shipping etc etc<br><br>Please see below 40 detailed reasons why Southern Water should not proceed as they not reliable<br><br>with best wishes for your attention | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. |

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| | The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers. (For further detail refer to item A below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23A&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930499413%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Vx6Lp3NoVJ%2Fp%2FajX%2BI%2BnoDNy8v1Z9LtDTDRtHAF1I9M%3D&reserved=0 ).<br>2<br>SW have not completed a full review of the plan considering all alternative options as â€œa full re-appraisal exercise was not considered time or cost beneficialâ€• (Annex 20, page 3). Given the importance of finding immediate solutions for the rivers Test and Itchen and at Pulborough, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. More sustainable options previously â€˜parkedâ€™ by SW which work with predicted climate changes should have been more robustly assessed and included in the revised draft plan.<br><br>3<br>It is clear that SW have only focused on identifying options to fill the gap as a result of the delay to recycling options in Hampshire and at Littlehampton (Annex 20, page 1 and 3) instead of seriously looking at prioritising more sustainable options.<br><br>4<br>The timescales for 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 precious and iconic chalk rivers with no solution for longer.<br>5<br>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. (For more detail refer to item B | 2) Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>3) The purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard.<br><br>4) With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>5, 6) It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for |

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| | below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23B&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930525938%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=W7jpiCfEqydSHeOaY0sfXeo%2FNxYNo2buwegkKtU1NBw%3D&reserved=0 .) 6 SW should not be allowed to rely on continued use of the Candover drought option, Lower Itchen and Test drought orders, while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered as proposed (Annex 20, page 1 and 2), as it is inevitable that the Hampshire recycling scheme will be delayed further and will not be available in 2035, a more sustainable solution must be developed. 7 Tankering water from Norway in a drought cannot be accepted as a credible drought plan. (For more detail refer to item C below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23C&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930542411%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=DeeeKgLpxJoldCxIT1xPcnh%2B%2FI2jKM4R3ddYiLfpP3Q%3D&reserved=0 ). 8 SW are unnecessarily pessimistic in their assumptions regarding population growth and this is driving a large demand deficit. The information provided is also contradictory with Annex 7b forecasting 23.56% growth and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible. (For more detail refer to item D below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23D&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930555420%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=VaqmuA4n9ZWRqvCFDAoiK0bUoAdZXr8tkoaY6Kn3dj8%3D&reserved=0 .) 9 Assuming high levels of abstraction reform is over precautionary when what will be required in future is currently very uncertain as SW environmental studies are still ongoing. This is driving a large demand deficit which helps SW justify their unsustainable effluent recycling schemes. (For more detail refer to item D below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23D&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930567308%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=2gSwN4OJnuGK6miEdJRRMf0rbCAkmO4XwXdxR8FohiI%3D&reserved=0 .) | the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report. 7) With regard to the viability of sea tankering, this option is no longer included in our plan. 8) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation. 9) The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and |

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| | Assuming no abstraction at all even in winter from the rivers Itchen and Rother is not appropriate and over precautionary. (For more detail refer to item E below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23E&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930584546%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=hfJCNMl5XNqmbs0RADVQCHZH2l5D7WL5tqjfnggro3w%3D&reserved=0 .)<br>10<br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control.<br>An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050, rather than the 53% leakage reduction target they have set themselves by 2050.<br>11<br>SW have not taken account of the completion of the Hampshire Grid improvement programme which 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 within Hampshire by merging existing zones could have changed the options appraisal process. (For more detail refer to item F below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23F&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930597345%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=TN%2FU9425jPXKcVdIUBR8f7hbIOVUGnP%2BNQM8zqulcyI%3D&reserved=0 .)<br><br>12<br>The investment model is not fit for purpose it needs to be urgently revised 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, whereas it currently favours large infrastructure schemes which should be a last resort once more sustainable options have been exhausted. (For more detail refer to items K and L below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23K&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930613483%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=23pTuX%2BpayYpZCPEEX62lktwhE1DwrRMnlq0grbBK1M%3D&reserved=0 .)<br>13 | natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>10) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>11) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>12) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least |

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| | The possibility of market trading for â€˜water creditsâ€™ is mentioned. This is a concern as it could create a new loophole for water companies and speculative developers to exploit to make money, while not actually doing anything to fix the problems faced. | cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6). |
| | 14<br>Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers.<br>15<br>The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. (For more detail refer to item M below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23M&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930630304%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=WpO4c8nTcjldNk3pux%2FPN3byHQ5mhH5Zl3SY0RhSewM%3D&reserved=0 .)<br>16<br>SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br>17<br>The process of environmental assessment and screening methodology cannot be robust if unsustainable and environmentally damaging schemes like the Hampshire effluent recycling/transfer scheme get through. The scheme that in 2022 when it was selected had the highest environmental impact score.<br>18<br>For more information on the key concerns and environmental impacts associated with the Hampshire effluent recycling scheme via Havant Thicket Reservoir please refer to the https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fkey-concerns%2F&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930643083%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=il03yQ1VT%2F%2FS1WsYHGxtfBc0CRqTJVhTNbsIVQN%2FF0Q%3D&reserved=0 | 13) Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings.<br>Affinity Water are investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br><br>14) Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>15) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>16) A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>17) We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact. |

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| | Key Concerns<br>https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fkey-concerns%2F&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930655227%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=KNuou%2BfTLAnjnu6pSWaWfRCjkFYM23tQFS76RIHQjWw%3D&reserved=0 page at this link https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fkey-concerns%2F&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930667312%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=8%2Br4dnZR%2Fjf%2BlNeHxdhBxqfYBAli9JvW93d94ACNGWk%3D&reserved=0 .<br>Concerning option selection<br>19<br>Moving the [redacted] abstraction to the tidal limit would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. This is not mentioned as an option that has been considered in the SW Technical Report, nor Annex 20.<br>20<br>In the future SW indicate 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. Moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows in rivers to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. (Why is the solution of moving abstractions to the lower catchment of rivers not being prioritised for investigation as a more sustainable solution across the region?)<br><br>21<br>More challenging targets must be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the companyâ€™s control. Investigation and delivery should commence in 2025 to ensure these schemes are delivered as quickly as possible, to provide at least 13.8 Ml/d to help better manage resources in the catchments and protect the rivers Test and Itchen from drought orders. We need Defra and the regulators to strongly challenge on this to ensure a quicker delivery date. (For more detail refer to item H below https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23H&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930685737%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=V46UmpOuFpadxeobGAOPLvU3ozkjTzErupF9iFwELik%3D&reserved=0 .) | 18) Noted<br><br>19, 20) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan. |

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| | 22<br>The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. This is essential and should be prioritised and funded urgently so that these schemes can be included as feasible options. (For more detail refer to item G below<br>https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23G&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930701503%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=YW%2FxQA%2Fg5Z7rDbQ5k6%2FeXLq59FK5%2BDD4uBE8C3sQcI8%3D&reserved=0 .)<br>23<br>Proposed schemes to recycle water currently wasted at the [redacted] and Test Surface Water WSW should be prioritised more urgently to help minimise abstraction on the Test and Itchen all the time, not only in a drought (Annex 20, page 32).<br>24<br>No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme. A scheme previously indicated to be feasible with sites that are closer to where the water is needed. (For more detail refer to item J below<br>https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Fwrmp2024%2F%23J&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930715633%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=E0yGXxhiPXRcU9ih8wHoCwXNIgPSimc0TJ3HmrbLvY0%3D&reserved=0 .)<br><br>25<br>Negotiations with a very large industrial water user in South Hampshire should have been brought forward as a priority, to explore alternative supply options when the contract expires in 2026, to free up drinking water for SW customers in a drought (Annex 20, page 6) and provide more certainty for the plan.<br>Could a desalination plant that trials research into alternative technology, potential uses for the hyper saline solution and reducing energy consumption be a way forward for this site (Annex 20, page 30 refers) perhaps in partnership with industry.<br>26<br>In West Sussex the need for network upgrades is being used as an excuse not to bring forward schemes at existing works that would increase supply (Annex 20, Appendix A). If all of these schemes rejected for this reason were brought forward, they could deliver more than 20Ml/d of water to the Central Region. This is more water than is to be provided by the proposed Littlehampton (Ford) effluent recycling scheme which will discharge to the Western Rother. The | 21) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>22) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>23) With regard to prioritisation of recycling water at Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. These would be considered for WRMP29.<br><br>24) We are focussed on delivering the HWTWRP by 2033-34. The alternative option to use Fareham for recycling water has not been shelved but is put on hold. |

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| | necessary network upgrades in West Sussex should form part of the plan. Network upgrades are taking place in Hampshire to address such concerns, why not in West Sussex?<br>27<br>Across the Western and Central Area the fact that sources â€˜might not be available in a droughtâ€™ 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 18 Ml/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.<br>28<br>Multiple cheaper and more sustainable schemes have been rejected by SW because they â€˜cannot be delivered in timeâ€™ (presumably this means by 2030).<br>17 schemes in Hampshire and IOW (Western Area) could deliver at least 42 Ml/d.<br>7 schemes in West Sussex (Central Area) could deliver at least 18 Ml/d<br>Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are putting all of their â€˜eggs in one basketâ€™. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>29<br>SW are still not urgently investigating and bringing forward additional new reservoir schemes in the short to medium term, despite this being customers preferred choice. The delivery of the River Adur project is not scheduled until 2039/40, no other reservoir schemes are in the pipeline in Hampshire or West Sussex in the revised draft plan.<br><br>30<br>Groundwater schemes on the Isle of Wight (IOW) are not brought forward as the water gained cannot be transferred to the mainland to help the rivers Test and Itchen in a drought (Annex 20, page 5-6). However, if implemented they would reduce the amount of water that needs to be transferred from Southampton to the IOW providing a benefit that should be pursued.<br>31<br>The timescale for delivery of ten years should not be seen as a valid reason to reject provision of a bi-directional link between the IOW and the mainland, especially as it could allow water to be used more flexibly in a drought, including use of future spare water from Sandown.<br>32<br>There has been little proactive work by SW to investigate buying or trading licences with private supply users across the region. In a restricted document supporting the previous draft plan it indicated buying just one licence could deliver 19.7 Ml/d. There should be more proactive investigation and negotiation by SW to buy existing private abstraction licences, this in turn | 25) We will be exploring the option of amending the bulk supply agreement with a large industrial user in HSW WRZ when the existing contract expires in 2026. However, we are not planning to consider any changes to the bulk supply agreement for WRMP24.<br><br>26) Network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br><br>27) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences, which typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods.<br><br>28) Notwithstanding the fact that these 17 schemes are not explicitly identified in this query, there is little benefit in developing 17 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030.<br><br>29) We have looked at over 50 reservoir options as part of our options appraisal process over the last 3 WRMP cycles. These are not taken forward due to environmental concerns that will make it difficult to get planning permission. However, we review these options for each WRMP cycle and will review them again for WRMP29.<br><br>30) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040. |

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| | would then open up the potential for a more flexible approach to the use of licences within a catchment to meet water supply needs and environmental objectives.<br>33<br>Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to reduce their use of drinking water for non-potable uses. This can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions.<br>34<br>The free water butt scheme trialled on the IOW should be rolled out across the SW supply area to customers as a priority.<br>35<br>To read about a strategy for a better way forward please refer to the Water Matters page on â€˜A better way forwardâ€™ at this link https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fhavantmatters.org%2Fwater%2Ffuture%2F&data=05%7C02%7Cwater.resources%40defra.gov.uk%7C1f230eb56cac43fc8dda08dd07c8f753%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638675281930729123%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C%7C&sdata=K4En0Rn9MWb0nivHWK1Gj9792t7oelV9y%2FECyo5VlnY%3D&reserved=0 .<br>Concerning inadequate consultation with water users and affected communities<br>36<br>Critical documents 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. In fact there are more documents restricted in 2024, than there were in 2022. Is this a deliberate play 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. Other water companies made this information more accessible.<br>37<br>Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling?<br>38<br>Assurances given by SW that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met.<br>39<br>Lack of adequate and meaningful engagement /consultation with customers;<br>â€“ A very significant alteration is taking place to customerâ€™s water supply with the source changing from river, spring or groundwater to recycled effluent. SW should be proactively engaging with all their customers to get their feedback on this material change. | 31) The delivery time of an option is the reason for rejection only in cases where water is needed earlier than the option can be delivered. The delivery time in itself is not a reason for rejecting an option.<br><br>32) We are open to licence trading. The Sittingbourne industrial re-use scheme in our Kent area is effectively a licence trading scheme that will provide up to 8Ml/d from 2030-31 onward.<br><br>33) Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency.<br><br>34) Regarding water butts, following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>35) Noted<br><br>36) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or ‘the Act’ (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a |

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| | â€“ 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 the [redacted] desalination scheme was rejected, and the WRMP19 back-up option of discharging recycled effluent to the River Itchen was also 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 a full public consultation. This did not happen.<br><br>â€“ As a result, communities in the areas affected by the selected options did not have the opportunity to comment at the â€˜formative stageâ€™ of the plan, before the new effluent recycling options were selected.<br><br>â€“ At the time of previous consultations (2020 to 2022) posters were not even placed at 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.<br><br>40<br>The consultation documents are vast, very repetitive and fail to provide important information, or make it restricted and inaccessible, making it very difficult for a lay person to understand/get through the consultation reports. Is this intentional?<br>Since this is a â€˜once-in-a-generationâ€™ chance to address future water needs, there needs to be a more open discussion about moving to a more sustainable approach which works with predicted climate change, not against it. | non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>37) We consulted extensively with our customers and stakeholder before publishing our dWRMP24 and solicited their views on the different option types. However, we have a statutory duty to maintain uninterrupted supply of water in all but the most extreme weather conditions, which may mean selecting options less preferred by customers.<br><br>38) The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>39) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report.<br><br>In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A.<br><br>We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here: |

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| | | https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/<br><br>40) We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan. |
| WRMP1037 | Fao Secretary of State for Environment Steve Reed<br>Introduction<br>One can see why the SoS might be minded to approve this scheme. It ticks elements of the new Gov agenda -- huge infrastructure, many jobs and seemingly attractive solution to anticipated water shortages across a large area of the southeast. But it clearly falls foul of others, particularly the environmental agenda and net zero commitments.<br>I, like many thousands of others, whether directly affected or not, object strongly to the proposal and urge the SoS to take heed of the many arguments against this £1.2 billion scheme.<br>I summarise some of these below.<br>It is the wrong scheme<br>We do not need to start expensive processing of waste water. SE England is not currently water poor (and wetter winters are predicted) but some parts are water stressed because we currently store less than 2% of the free supply of rain. We also currently waste enormous amounts of treated drinking water.<br>Alternatives<br>There are many cheaper solutions which have not received due consideration in the proposal such as<br>1. developing a full range of storage facilities for excess rainwater including small reservoirs, aquifers, lakes, wetlands, tanks and rain butts closer to demand.<br>2. rolling out a comprehensive leak repair programme. SW currently loses 100million litres per day of purified water which is clearly unacceptable. Reducing this to 50million litres a day by 2030 would alone supply all the extra water SW is planning to provide by reverse osmosis to meet predicted need.<br>3. introducing universal metering to better control consumption and waste,<br>4. advising planners of the need to limit inward migration and new development so that demand for SW's services does not exceed to that which it is possible to supply.<br>Environmental Problems with the Waste Water Recycling Proposal<br>a)Impact on Langstone Harbour/Solent of<br>i) leach from deep drilling into the derelict industrial waste dump near [redacted] where the huge reverse osmosis plant is to be sited and<br>ii)discharge into Langstone Harbour and Solent of the highly concentrated remaining waste products.<br>b) Damage by construction of the enormous pipework system through Havant to HTR and to the [redacted] Pumping Station (40km away). | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Despite perceptions that the South-East of England receives high volumes of rainfall, it is nonetheless classified as an area of 'serious water stress', see here.<br><br>1) We have considered a number of storage options including reservoirs and aquifers in the past and will reassess them for WRMP29. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). It is worth noting, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. We have been promoting the use water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br>2) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030.<br>3) Smart metering across our customer base over AMP8 underpins our demand management strategy. We plan to replace all our existing meters with smart meters by 2030.<br>4) We will continuously monitor the effectiveness of our demand management initiatives and closely follow developments in this area across the UK water sector.<br><br>a) SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Building on former landfill sites is commonplace and, when |

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| | c) Carbon footprint/water quality<br>i) The construction process will be carbon intensive and the year-round 24/7 energy requirement of pumping and processing will be huge.<br>ii) Adding the treated wastewater to the spring water will completely change the water quality and risk pollution from the inevitable malfunctions. Further independent analysis of the impact on wildlife and locals is required.<br>Process<br>a) Permission<br>Havant Borough Council gave approval to Portsmouth Water's plans to develop and supply a reservoir to store and redistribute excess spring water from Bedhampton as required. It was to reduce the local need for chalk stream extraction, cover drought periods and be a recreational and ecological asset to the area.<br>SW are seeking to piggyback onto and massively extend this scheme by pumping treated sewage waste from [redacted] into the reservoir, for use by a wide range of their own customers both west and east of Havant.<br>Because this scheme is designated "National Infrastructure" HBC cannot veto this proposal but their view should be paramount.<br>b) Consultation<br>The "public" consultation has been a sham. Neither Southern Water nor Portsmouth Water has notified their customers about this consultation. Nor we understand have parish councils or other interested parties been notified. Information for the general public has been conspicuously absent.<br>4. Viability<br>Trust is at an all-time low. SW is a debt ridden ailing and failing company which has consistently proved unable to provide safe wastewater disposal for its existing customers. It would surely be highly irresponsible to entrust this company with constructing and managing such a complex and costly scheme. The fact that such schemes work well elsewhere in the world is of no reassurance whatsoever.<br>Conclusion<br>Having taken heed of these and all the many other reasons why this proposal is flawed I am hopeful that it will be refused.<br>Should however the SoS be minded to approve this scheme surely<br>i) full and proper public consultation.<br>ii)environmental impact assessments and<br>iii)a full option appraisal<br>must first be completed and results published before any final decision is made. | done carefully, poses little risk to the environment. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br>b) Our Environmental Impact Assessment is providing a rigorous and proportionate approach to assessing and managing the effects of the Project and we're ensuring that environmental considerations inform the Project's design. We have already embedded several measures at the early design stages of the Project to avoid or minimise potential environmental effects.<br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. Regarding effects of recycled water on the chemistry of Havant Thicket reservoir, purified recycled water is extremely clean. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025. The options and risks are assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process.<br><br>a) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought. Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br>b) In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation. Our consultation engagement with our |

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| | | customers and stakeholders is described in more detail in Annex 5 of our rdWRMP24 Technical Report. We have received 1176 responses as part of rdWRMP24 consultation.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP1038 | Dear DEFRA,<br><br>We are objecting strongly to Southern Water's WRMP. As residents of Hayling Island and we are very concerned that this effluent recycling scheme is totally unacceptable and inappropriate for our needs. This plan takes us in completely the wrong direction. Why are we not collecting more of our rainfall instead of spending a fortune in money and energy to recycle wastewater? Why is Southern Water not focusing on improving their leakage reduction? Why are they not replacing the ageing pipe network? Southern Water's replacement rate of just 1 in 1000 years when a water main is only designed to last 120 years is unacceptable.<br><br>Southern Water have shown that they cannot be trusted to operate and maintain its current traditional infrastructure without causing pollution. What hope is there of Southern Water safely operating the complex advanced effluent recycling treatment technology without incident? Southern Water have a very poor track record of treatment plant and pumping station failures, they have had many prosecutions for pollution incidents and failure to take prompt action to rectify problems. The risk of pollution to the Havant Thicket Reservoir as well as damage to Langstone Harbour and the Solent is totally unacceptable.<br><br>Southern Water need to do more to protect the environment and develop a strategy that helps them honour their commitment to be carbon neutral by 2030. Our river catchments could be protected much more quickly if they moved river abstractions closer to the tidal limit, and abstraction boreholes down the catchment, reducing the priority for abstraction reform which is driving the need for effluent recycling. Storage options need to be developed closer to where the water is needed, so that long pipelines that damage our countryside and wildlife are not required. Options need to be developed that do not have such a high carbon and emissions footprint. We need a strategy that prioritises low energy solutions, the energy alone for the | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). It is worth noting, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers. https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the |

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| | Hampshire scheme will cost more than £3 million/year. With pumping and treatment needed 365 days a year, even though effluent recycling was selected as a drought resource.<br><br>In a time of climate emergency how can Southern Water select the schemes with the highest carbon footprint and emissions?<br>– The Hampshire and Littlehampton effluent recycling schemes have the highest negative environmental impact score of any of the options considered.<br>– The effluent recycling schemes to be developed by 2035 each have a higher carbon impact than the transfer of water from Norway by sea tankers.<br><br>The risks from developing the effluent recycling plant on a landfill are unacceptably high. If this plan were to go ahead then Southern Water must be told to find an alternative site for the recycling plant at Havant. The risk of constructing large tunnel shafts and hundreds of piles through the 13m deep contaminated landfill waste site into the chalk aquifer below adjacent to Langstone Harbour are just too great.<br><br>DEFRA needs to change the water industry funding mechanism to stop incentivising infrastructure heavy solutions but instead to encourage development of sustainable solutions that work with climate change.<br><br>I am very concerned that effluent recycling is not needed, the negative environmental impacts are too great, and the enormous costs to build and operate are unacceptable. I am asking DEFRA to reject the plan and require Southern Water to develop a more sustainable plan that works with climate change and which puts the environment before profit. | sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy. Sea tankering from Norway is no longer included in our plan.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill.<br><br>Regarding funding mechanisms, the Government launched an Independent Commission into the water sector and its regulation on 23 October 2024, led by Sir Jon Cunliffe. The Commission is part of a government review of the water industry and will report recommendations to the Government in Q2 2025 (between April and June) on how to tackle inherited issues in the water industry. We expect the Commission to make recommendations on water sector funding and an approach to infrastructure as part of its report. |

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| WRMP1039 | I have the following concerns with Southern Water's revised plan:<br>1 The plan does not strive to work with predicted changes to our climate to capture more winter rain for use in dry summers. Rainwater provides a good quality free raw water resource and we need to prioritise schemes that capture and store it for dry summers.<br>2 SW have not completed a full review of the plan considering all alternative options as "a full re-appraisal exercise was not considered time or cost beneficial" (Annex 20, page 3). Given the importance of finding immediate solutions for the rivers Test and Itchen and at Pulborough, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. More sustainable options previously 'parked' by SW which work with predicted climate changes should have been more robustly assessed and included in the revised draft plan.<br><br>3 It is clear that SW have only focused on identifying options to fill the gap as a result of the delay to recycling options in Hampshire and at Littlehampton (Annex 20, page 1 and 3) instead of seriously looking at prioritising more sustainable options.<br><br>4 The timescales for 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 precious and iconic chalk rivers with no solution for longer.<br>5 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. (For more detail refer to item B below.) | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>1) With regard to storage, reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>2) Following the first public consultation on WRMP24 (Nov 2022 to Feb 2023) regulators asked us to look again at potential resilience options to reduce reliance on drought options. We carried out a targeted re-appraisal exercise and that informed the Annex 20 that was part of the WRMP24 consultation in 2024. This was not a comprehensive full options re-appraisal akin to that carried out for the main plan preparation. The key criterion for the resilience options was that they had to be operational by 2030-31. This ruled out large infrastructure options with significant lead time and led to a targeted reappraisal of options.<br><br>Having already undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE, repeating this was not considered time or cost beneficial. It is not possible to carry out a full, regional review now given that the other five WRSE companies have finalised their WRMPs. As recommended in feedback to the 2024 WRMP consultation we reviewed at a high-level a select number of options that could potentially meet the much narrower objective of reducing the continued reliance on drought options during the time period before the larger strategic options are available. This work is set out in Annex 20 of our fdWRMP24 and we will continue to explore alternatives to drought permits and orders throughout the 2025-30 period to inform the next round of WRSE plans and our WRMP29.<br><br>3) The purpose of the targeted options appraisal process for rdWRMP24 was to mitigate the impacts of a proposed extended reliance on the River Test and Candover drought options in Hampshire post 2030 and to limit the use of Pulborough surface water drought option under droughts of more than 1-in-200 year severity beyond 2030. Annex 20 to our rdWRMP24 Technical Report describes the work carried out in this regard.<br><br>4) With regard to delivery timescales, we aim to have the Hampshire Water Transfer and Water Recycling Project operational by 2034.<br><br>5, 6) It is our desire to 'avoid' use of drought options and become more drought resilient. We are working on this and we are making significant investments to reduce our need for the Candover/Test/ Itchen drought permits and orders. However, at the moment, as we wait for the new schemes, the reliance on some drought options (e.g. the River Test Drought Permit) |

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| | 6 SW should not be allowed to rely on continued use of the Candover drought option, Lower Itchen and Test drought orders, while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered as proposed (Annex 20, page 1 and 2), as it is inevitable that the Hampshire recycling scheme will be delayed further and will not be available in 2035, a more sustainable solution must be developed.<br>7 Tankering water from Norway in a drought cannot be accepted as a credible drought plan. (For more detail refer to item C below).<br>8 SW are unnecessarily pessimistic in their assumptions regarding population growth and this is driving a large demand deficit. The information provided is also contradictory with Annex 7b forecasting 23% growth and Annex 14 referring to a 17% increase by 2050. Surely that level of population growth is not credible. (For more detail refer to item D below.)<br><br>9 Assuming high levels of abstraction reform is over precautionary when what will be required in future is currently very uncertain as SW environmental studies are still ongoing. This is driving a large demand deficit which helps SW justify their unsustainable effluent recycling schemes. (For more detail refer to item D below.)<br>Assuming no abstraction at all even in winter from the rivers Itchen and Rother is not appropriate and over precautionary. (For more detail refer to item E below.)<br><br>10 SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Yet their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling schemes. Without a more ambitious mains replacement programme they will never get leakage under control.<br>An industry leakage specialist tells us that if Southern Water prioritised and funded leakage reduction they could strive to achieve a 50% reduction by 2040 and a 70% reduction by 2050, rather than the 53% leakage reduction target they have set themselves by 2050.<br>Government figures indicate that Southern Water lose a further 3.2% of the water they take from the environment before it even reaches a treatment works. This shows a complete disregard by the company for just how precious water is.<br>11 SW have not taken account of the completion of the Hampshire Grid improvement programme which 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 within Hampshire by merging existing zones | is essential because, without it, there would be insufficient supply to meet the demands of thousands of our customers in Hampshire in some scenarios. We discuss the changed delivery dates in Section 6.3.4 of our rdWRMP24 Technical Report.<br><br>7) With regard to the viability of sea tankering, this option is no longer included in our plan.<br><br>8) For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>9) The government has set a 25 Year Environment Plan target of 75% of waters to be close to their natural state. Abstraction reform plays a key part in this plan. Sustainable water abstraction is essential to ensure that river flows and groundwater levels support ecology and natural resilience. Since 2008 the Environment Agency has made changes to over 270 abstraction licences to prevent over 30 billion litres of water per year being removed from the environment where abstraction is unsustainable.<br><br>Water companies, through their WRMPs, need to plan for future deficits in supply generated by reductions in abstraction licences. Through the Water Industry National Environment Programme (WINEP), studies and investigations are ongoing to understand the environmental impact of our current licences. Any future licence changes are informed by the conclusions of these WINEP environmental studies.<br><br>10) The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in |

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| | could have changed the options appraisal process. As the plan does mostly cover the period beyond 2030 the improved connectivity of the grid in the Western Area supply area by 2030 should have been fully considered and taken into account in the plan.<br>12 The investment model is not fit for purpose it needs to be urgently revised 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, whereas it currently favours large infrastructure schemes which should be a last resort once more sustainable options have been exhausted.<br><br>13 The possibility of market trading for 'water credits' is mentioned. This is a concern as it could create a new loophole for water companies and speculative developers to exploit to make money, while not actually doing anything to fix the problems faced.<br><br>14 Given spiralling costs, programme delays, significant environmental effects, the need to operate 365 days a year, lack of legacy and short life-span, the Hampshire effluent recycling scheme cannot represent best value for customers. In fact, the restricted documents confirm that the Hampshire effluent recycling/ transfer scheme is almost as expensive to operate (OPEX) per megalitre as tankering water in from Norway!<br><br>15 The selection of effluent recycling via Havant Thicket and transfer (40km) to [redacted] results in unacceptably high carbon impact and greenhouse gas emissions, more than double that of any other transfer or desalination scheme. In fact, the restricted documents confirmed that the Hampshire effluent recycling/ transfer scheme has a higher total carbon, average carbon emissions & embedded carbon impact than sea tankering water in from Norway!<br><br>16 SW Preliminary Environmental Information Report (2024) confirmed a likely significant effect on the marine environment from the Hampshire effluent recycling scheme. Modelling for water quality impacts on the reservoir is still not available. The scheme should not move forward until the environmental risks/impacts are known.<br><br>17 The process of environmental assessment and screening methodology cannot be robust if unsustainable and environmentally damaging schemes like the Hampshire effluent recycling/transfer scheme get through. In fact, the Strategic Environmental Assessment confirmed that the Littlehampton Effluent Recycling scheme and Hampshire effluent recycling scheme had the highest negative impact scores, yet both of these options were selected by Southern Water. | this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>11) We have fully accounted for the availability of the Hampshire Grid and the flexibility it offers in moving water around Hampshire. However, the grid will deliver its optimum benefit where there is sufficient water available in Hampshire to transfer across the area. This will require the completion of the Havant Thicket Reservoir and the HWTWRP.<br><br>12) The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>13) Environmental markets are one way to facilitate greater investment in environmental improvements delivered by technical solutions. A Water Saving Market (WSM) would work by facilitating trade between buyers and suppliers. A well-designed market will have clear governance and operational settings.<br>Affinity Water are investigating the feasibility of a Water Saving Market to deliver water efficiency solutions and support water neutrality. As the only region in the UK with established water neutrality requirements, Southern Water is supporting Affinity Water in this feasibility study, together with Local Authorities from the region. Sussex North WRZ is one area proposed for the study, as an area with existing water scarcity issues and developmental pressures. SW continues to work with all stakeholders in the SNZ region to support greater understanding of water scarcity issues and explore potential solutions.<br><br>14) Multiple options were considered during the options appraisal process that was carried out as part of the RAPID gated process to identify alternatives to West Southampton Coast desalination and the HWTWRP consistently scored higher than other options. It was approved by RAPID for adoption as the preferred Strategic Resource Option (SRO) to be progressed in Hampshire. Please see section 3.2 in our fdWRMP24 for more detailed reasoning on why West Southampton Coast desalination was not taken forward beyond RAPID Gate 2.<br><br>Sea tankering from Norway is no longer included in our plan.<br><br>15) Using Havant Thicket reservoir to store purified recycled water has been selected as the optimum way of making up a large part of the shortfall we face in Hampshire. Pumping 60 |

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| | 18 This is a short-sighted water resource plan, customers will still be paying for the effluent recycling infrastructure after it has become redundant due to the Ofwat funding mechanism. With the recycling plants expected to last just 60 years, the huge cost of constructing these schemes cannot be justified, especially as these options leave no tangible legacy for the future. The Hampshire effluent recycling / transfer scheme alone will cost at least £1.2 billion. Customers will also have to pay for the eye-watering debt generated well into the future.<br>19 Moving the [redacted] abstraction to the tidal limit would be a better, more robust and sustainable solution to protect the whole of the freshwater catchment and restore natural flows in a drought. This is not mentioned as an option that has been considered in the SW Technical Report, nor Annex 20.<br>20 In the future SW indicate they will work with stakeholders to look at moving the abstraction on the River Adur to the estuary (transitional waters) to allow more abstraction but this is not in the current plan. Moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows in rivers to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. (Why is the solution of moving abstractions to the lower catchment of rivers not being prioritised for investigation as a more sustainable solution across the region?)<br>21 More challenging targets must be set for delivery of the groundwater borehole schemes and Test Managed Aquifer Recharge Scheme in Hampshire, as they require minimum infrastructure and are within the company's control. Investigation and delivery should commence in 2025 to ensure these schemes are delivered as quickly as possible, to provide at least 13.8 Ml/d to help better manage resources in the catchments and protect the rivers Test and Itchen from drought orders. We need Defra and the regulators to strongly challenge on this to ensure a quicker delivery date. (For more detail refer to item H below.)<br>22 The investigation of other aquifer storage schemes in Hampshire, the IOW and West Sussex is not being prioritised to establish the yield they could provide. This is essential and should be prioritised and funded urgently so that these schemes can be included as feasible options. Aquifer storage has been successfully used for many years across the world, including in California and in the Thames Basin (UK). Tests in Dorset have previously shown that aquifer storage and recovery is feasible in confined sections of the chalk.<br>23 Proposed schemes to recycle water currently wasted at the [redacted] and Test Surface Water WSW should be prioritised more urgently to help minimise abstraction on the Test and Itchen all the time, not only in a drought (Annex 20, page 32).<br>24 No work is taking place to ensure the alternative Hampshire effluent recycling option using [redacted] and a bespoke environmental buffer lake are advanced as a back-up, despite this work having been allocated funding by Ofwat. Nor is there any reference to further investigation of a combined Portswood and [redacted] scheme. A scheme previously indicated to be feasible with sites that are closer to where the water is needed. (For more detail refer to item J below.)<br>25 Negotiations with a very large industrial water user in South Hampshire should have been brought forward as a priority, to explore alternative supply options when the contract expires in 2026, to free up drinking water for SW customers in a drought (Annex 20, page 6) and provide more certainty for the plan. | million litres of water a day into the reservoir will allow up to 90 million litres a day to be taken during a drought.<br><br>16) A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>17) We have engaged an independent consultant for our environmental assessments who are following the standard methodology for these assessments. The investment model takes into account the outcome of environmental assessments and if two otherwise equivalent options are available, it will select the option with lower environmental impact.<br><br>18) The Hampshire Water Transfer and Water Recycling Project (HWTWRP) is one of the schemes we need to protect the globally important River Itchen and River Test chalk rivers. The scheme will reduce our reliance on these internationally protected rivers during drought and provide a more reliable and sustainable source of water in the future. The increase in customer bills in the first year is a recognition by Ofwat of the costs of developing this scheme, which will be highest in the first half of AMP8.<br><br>19, 20) We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. One of the complications with moving abstractions close to sea is the impact of tides on the duration of abstraction and water quality. We will be exploring them further for our next plan.<br><br>21) A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>22) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>23) With regard to prioritisation of recycling water at Itchen WSW, as noted in the rejection register against these schemes, enhancements to treatment process are needed at these sites to reduce process losses. These would be considered for WRMP29.<br><br>24) We are focussed on delivering the HWTWRP by 2033-34. The alternative option to use Fareham for recycling water has not been shelved but is put on hold. |

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| | Could a desalination plant that trials research into alternative technology, potential uses for the hyper saline solution and reducing energy consumption be a way forward for this site (Annex 20, page 30 refers) perhaps in partnership with industry.<br>26 In West Sussex the need for network upgrades is being used as an excuse not to bring forward schemes at existing works that would increase supply (Annex 20, Appendix A). If all of these schemes rejected for this reason were brought forward, they could deliver more than 20Ml/d of water to the Central Region. This is more water than is to be provided by the proposed Littlehampton (Ford) effluent recycling scheme which will discharge to the Western Rother. The necessary network upgrades in West Sussex should form part of the plan. Network upgrades are taking place in Hampshire to address such concerns, why not in West Sussex?<br>27 Across the Western and 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 18 Ml/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.<br>28 Multiple cheaper and more sustainable schemes have been rejected by SW because they 'cannot be delivered in time' (presumably this means by 2030).<br>17 schemes in Hampshire and IOW (Western Area) could deliver at least 42 Ml/d.<br>7 schemes in West Sussex (Central Area) could deliver at least 18 Ml/d<br>Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 either, and that timescale will almost certainly slip further. SW are putting all of their 'eggs in one basket'. Surely it is better, more resilient and more sustainable to develop multiple smaller schemes, close to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades.<br>29 SW are still not urgently investigating and bringing forward additional new reservoir schemes in the short to medium term, despite this being customers preferred choice. The delivery of the River Adur project is not scheduled until 2039/40, no other reservoir schemes are in the pipeline in Hampshire or West Sussex in the revised draft plan.<br>30 Groundwater schemes on the Isle of Wight (IOW) are not brought forward as the water gained cannot be transferred to the mainland to help the rivers Test and Itchen in a drought (Annex 20, page 5-6). However, if implemented they would reduce the amount of water that needs to be transferred from Southampton to the IOW providing a benefit that should be pursued.<br>31 The timescale for delivery of ten years should not be seen as a valid reason to reject provision of a bi-directional link between the IOW and the mainland, especially as it could allow water to be used more flexibly in a drought, including use of future spare water from Sandown.<br>32 There has been little proactive work by SW to investigate buying or trading licences with private supply users across the region. In a restricted document supporting the previous draft plan it indicated buying just one licence could deliver 19.7 Ml/d. There should be more | 25) We will be exploring the option of amending the bulk supply agreement with a large industrial user in HSW WRZ when the existing contract expires in 2026. However, we are not planning to consider any changes to the bulk supply agreement for WRMP24.<br><br>26) Network enhancements in the Central area were not taken forward as the required enhancements could not be delivered by 2030. These will be reconsidered for WRMP29.<br><br>27) The amount of water we can abstract from river and groundwater sources are determined by our abstraction licences, which typically specify the maximum amount of water we can take from a source over a year with a limit set on maximum daily abstraction. We cannot take unlimited amount of water from these sources during wet periods.<br><br>28) Notwithstanding the fact that these 17 schemes are not explicitly identified in this query, there is little benefit in developing 17 schemes by the 2030s when the three schemes we are progressing will deliver the over twice the volume over a similar timeframe. We did not simply reject schemes because they could not be delivered by 2035. Only the schemes that were considered to mitigate the use of drought permits and orders beyond 2030 had to meet the criterion of being deliverable by 2030, because schemes delivered after 2030 would not be able to mitigate the reliance on drought permits and orders beyond 2030.<br><br>29) We have looked at over 50 reservoir options as part of our options appraisal process over the last 3 WRMP cycles. These are not taken forward due to environmental concerns that will make it difficult to get planning permission. However, we review these options for each WRMP cycle and will review them again for WRMP29.<br>30) Our plan includes two groundwater schemes on the IOW to provided up to 3.4Ml/d 2040.<br><br>31) The delivery time of an option is the reason for rejection only in cases where water is needed earlier than the option can be delivered. The delivery time in itself is not a reason for rejecting an option.<br><br>32) We are open to licence trading. The Sittingbourne industrial re-use scheme in our Kent area is effectively a licence trading scheme that will provide up to 8Ml/d from 2030-31 onward.<br><br>33) Our water efficiency plan includes helping non-household customers reduce their consumption through smart metering and water audits as well as a collaborative fund to promote water efficiency.<br><br>34) Regarding water butts, following the success of the pilot scheme, this is now being replicated in Kent, where we are installing more than a thousand free water butts to help reduce storm overflows in Whitstable, Deal, Swalecliffe, Margate and in Fairlight, East Sussex.<br><br>35) Noted |

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| | proactive investigation and negotiation by SW to buy existing private abstraction licences, this in turn would then open up the potential for a more flexible approach to the use of licences within a catchment to meet water supply needs and environmental objectives.<br>33 Much more effort needs to be put into working with industry, agriculture, golf courses and community buildings (schools, social clubs and so on) to fix leaks, save water and reduce their use of drinking water for non-potable uses. Southern Water pilots have already demonstrated that great reductions can be achieved with free surveys and provision of grants to encourage the adoption of more sustainable solutions. Yet their targets for improvement in the first 10 years of the plan are woeful, with no benefit by 2030, and hardly any by 2035.<br>34 The free water butt scheme trialled on the IOW should be rolled out across the SW supply area to customers as a priority.<br>35 To read about a strategy for a better way forward please refer to the Water Matters page on 'A better way forward' at this link.<br>36 Critical documents 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. In fact there are more documents restricted in 2024, than there were in 2022. Is this a deliberate play 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. Other water companies made this information more accessible.<br><br>37 Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs and catchment management. Why are SW not listening to their customers and instead pushing ahead with the least favoured options of desalination and effluent recycling?<br><br>38 Assurances given by SW that water quality modelling and energy use information for the Hampshire effluent recycling scheme would be available in time for the 2024 consultation have not been met. | 36) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below.<br><br>https://waterresources.southernwater.co.uk/find-out-more/<br><br>37) We consulted extensively with our customers and stakeholder before publishing our dWRMP24 and solicited their views on the different option types. However, we have a statutory duty to maintain uninterrupted supply of water in all but the most extreme weather conditions, which may mean selecting options less preferred by customers.<br><br>38) The water quality modelling and assessments undertaken so far have shown that there are unlikely to be any ecological or biodiversity impacts in the Solent from the water recycling process. Water quality in the reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>We made clear in our Summer 2024 Consultation for the Hampshire Water Transfer and Water Recycling Project that water quality modelling and assessment work was ongoing and would be fully reported in our Development Consent Order application. As that work has progressed, we are now consulting on it as part of our Spring 2025 Consultation.<br><br>As part of our Summer 2024 Consultation, we shared our preliminary assessment of carbon emissions associated with the Hampshire Water Transfer and Water Recycling Project. This was based, in part, on energy usage information for the project. An updated carbon emissions assessment will be provided as part of our Development Consent Order application. The energy usage information used to support that will be appended to the assessment.<br><br>39) Our consultation engagement with our customers and stakeholders is described in Annex 5 of our rdWRMP24 Technical Report. |

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| | | In addition to publishing the majority of our rdWRMP24 documents on our website, we arranged 8 roadshows across our supply area during October-November; 3 in our Western area, 2 in our Central area and 3 in our Eastern area. Southern Water staff were available at these roadshows to answer any questions on our rdWRMP24. Hard copies of our rdWRMP24 Technical Report and Non-Technical Summary of our plan were also available for attendees to view and take with them. In addition, we provided 5 area-specific webinars of 75 minutes duration each whereby we presented key features of our plan during the first 35-40 minutes with the remaining time allocated to Q&A. |
| | 39 Lack of adequate and meaningful engagement /consultation with customers;<br>– A very significant alteration is taking place to customer's water supply with the source changing from river, spring or groundwater to recycled effluent. SW should be proactively engaging with all their customers to get their feedback on this material change.<br>– 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 the [redacted] desalination scheme was rejected, and the WRMP19 back-up option of discharging recycled effluent to the River Itchen was also 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 a full public consultation. This did not happen.<br>As a result, 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.<br>At the time of previous consultations (2020 to 2022) posters were not even placed at 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. | We released a press release regarding the consultation, which was picked up by major newspapers; The Guardian and the Financial Times. We produced both targeted and non-targeted adverts on social media. We also publicised the consultation in our newsletter which, went out to all of our customers. MPs, Stakeholders and previous responders were all directly emailed regarding the consultation.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>For more information, see here:<br>https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/accelerated-gate-two-submissions-and-new-solution-proposals/ |
| | 40 The consultation documents are vast, very repetitive and fail to provide important information, or make it restricted and inaccessible, making it very difficult for a lay person to understand/get through the consultation reports. Is this intentional? | 40) We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan. |

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| WRMP1040 | Southern Water's Water Recycling System Proposal<br><br>This proposal is flawed on so many levels that it is surprising that it has gone this far.<br><br>Many others have criticised the details so very well that it does not need repeating.<br><br>The problem is that it is a proposal:<br>· made by a privatised industry for its financial benefit.<br>· It extends its monopoly power and reduces public accountability<br>· It is effectually a means of a private body taxing its captive customers without limit<br>· It seeks to take its monopoly over its raw materials -sewage – as the best, and only raw material for providing fresh water for human consumption in emergencies.<br><br>Southern Water should not extend their monopoly over the decision-making process.<br><br>DEFRA not the water industry and its lobbyists should be driving this project independently of these interested parties.<br><br>There are multiple preferrable alternatives ranging from:<br>o Building additional reservoirs<br>o Separating the fresh water at source from raw sewage instead of combining them.<br>o Building a new fresh water harvesting system (which would relieve the Water Companies of the peak loads which they cannot currently deal helping them to discharge their present statuary duties.)<br>o Capture the freshwater from streams just before their waters are polluted with seawater just before they enter the sea.<br><br>Southern Water have a conflict of interest in seeking to monopolise the debate.<br>Government should propel this debate – not rely on interested 3rd parties.<br>The Water Industry is mired in its own failures and practices. It is the last organisation to be allowed to dictate policy | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>The WRMP process is set out in primary legislation, within Defra directions and in guidance issued by the Environment Agency (EA), Natural England, Ofwat and Natural Resources Wales. We, Southern Water, have produced this WRMP24 in line with Directions and guidance issued by Defra and our regulators. We will continue to do so.<br><br>Our plan has been produced in collaboration with other water companies within the South East as part of the Water Resources South East (WRSE) regional group. We provide annual reviews of our WRMP to regulators and produce an entirely new WRMP every five years. This process allows for changes to be made to the WRMP to account for new information and consultation feedback. In rare cases, for example, where there are unresolved issues and substantial public interest exists the Secretary of State may call an inquiry or hearing.<br><br>In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history. It should be noted that Southern Water has temporarily suspended dividends to shareholders and has not paid dividends since 2017. Also, the £1.6 Billion investment funding received from Macquarie Asset Management has been paid to Southern Water Group and none of this amount has been paid to previous shareholders. |

| Reference | Feedback | Southern Water Response |
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| | | We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. |
| WRMP1041 | I object to Southern Water's scheme to use recycled sewage effluent from [redacted] to top up our water supply and build a treatment plant at Broadmarsh.<br><br>The scheme that Southern Water proposes is:<br><br>• costly to implement (£1.2 billion outlay for a life expectancy of c60 years),<br>• costly to run (estimated to be c£3M pa for Hampshire alone),<br>• detrimental to the environment (effluent recycling via Havant will have an unacceptably high carbon and greenhouse gas emissions impact)<br>• detrimental in impact on the fresh water environment and the marine environment (significant additional risk of pollution - particularly in Langstone harbour - with, currently, no plans for independent monitoring of the recycling plant discharge)<br><br>Southern Water should be made to:<br><br>• properly explore more cost-effective alternative solutions<br>• take heed of the impact of climate change<br>• consider the financial benefits of collecting and storing rainwater<br>• put eco systems and the environment before profit<br>• commit to a much needed upgrade and repair to the infrastructure<br>• be transparent about their plans and allow sufficient time and a proper forum for public consultation | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>Your objection to the use of recycled water in Havant Thicket has been noted.<br><br>• We appreciate that the capital cost, operating cost and energy consumption of our Hampshire effluent recycling scheme is higher than conventional sources of supply such as groundwater or rivers. However, those conventional sources are no longer available to us as they once were. When we carry out our options appraisal process, we must consider other factors alongside cost such as an options resilience to climate change, the volume of water it can provide, its environmental impact etc. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br>• Please see answer above.<br>• Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. |

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| | | We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br>• Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought. A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and any potential mitigations. The Environment Agency will determine the permit for the release of purified recycled water into Havant Thicket reservoir. They monitor and ensure compliance for all discharges to the environment.<br><br>• Southern Water has undertaken an extensive options appraisal that looked at more than 1,000 options with WRSE.<br>• Please see answer above relating to climate change being a key consideration when appraising options.<br>• We have considered a number of storage options in the past and will reassess them for WRMP29. This includes considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage).<br>• Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br>• In its business plan for the next five-year regulatory period, due to start in April 2025, Southern Water has proposed another step-change in investment amounting to approximately £8 billion of expenditure. This would be equivalent to investing circa £3,500 per household and would be the largest investment programme in the Company's history.<br><br>Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being |

| Reference | Feedback | Southern Water Response |
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| | | commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>The information provided in many of the documents is very technical with many requirements set out in statutory process and supporting guidance. As this is unavoidable we produced a non-technical summary document for those seeking a high level understanding of our plan. You can view the publicly available documents on the link below "https://waterresources.southernwater.co.uk/find-out-more/" |
| WRMP1042 | I am writing to let you know that I don't think it's a good idea for the planned recycling scheme (concerning the Havant Hants area).<br>I've read the 5 major points against the idea & my objection is overall that I don't think it's a good idea to send treated sewage back into our main drinking water supply, when we got some the best & cleanest - healthiest water in the country coming down off the Portsdown & Southdown hills - why ruin it?<br>Also, if something in the recycling system fails & raw sewage gets into the drinking water (like it has done with the sewage in langstone harbour scandle) then it will be like going back to the 1600 - 1700's when people took drinking water out the Thames in London & wondered why they were getting ill & dying - it could be complete genocide with thousands dying from E coli etc<br>The water system is working so far (apart from the sewage spills into Lanstone harbour but thats a separate issue) so why alter it? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. The plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. |
| WRMP1043 | I wish to comment on Southern Water's Draft Water Resources Management Plan and request that you reject it.<br>I am concerned about the proposals for using wastewater recycling based on the effluent from the [redacted] Waste Water Treatment Plant at Havant.<br>The wastewater recycling processes that are proposed (microfiltration, reverse osmosis and UV treatment with hydrogen peroxide) are largely unproven for the provision of drinking water in this country and I object to being used as a guinea pig for Southern Water's proposals. I have no confidence in their ability to operate such a system safely.<br>Southern Water should reconsider using the Havant Thicket Reservoir as an environmental buffer for this project. That usage risks irreversibly contaminating the reservoir. Also, it risks interfering with the planned seasonal fluctuations in the water level, in turn reducing the biodiversity gains that are planned for the reservoir.<br>The Broadmarsh area proposed for the wastewater treatment equipment is a most unsuitable site, situated on a former rubbish dump. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note you concerns about the use of recycled water in Havant Thicket. The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |

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| | I am appalled by the energy implications of running the treatment process continuously so that the equipment stays in good operating order. The energy requirements for pumping at least 30ML per day of the treated water over a distance of more than 40 km to [redacted] are huge and unnecessary. Alternative schemes must be possible that would be closer to the areas that require drinking water. Such alternatives that should be investigated include the construction of smaller winter storage reservoirs, increased use of aquifer storage and moving the existing water abstraction points closer to the tidal limit of the Rivers Test and Itchen.<br>I consider that all new housing to be built in the area should be to a higher specification of water conservation, such as by the provision of showers but not baths. Greater attention should be given by Southern Water to the elimination of leakage from their supply network.<br>Kind regards, | Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>With regard to effects of recycled water on biodiversity, purified recycled water is extremely clean. Water quality in Havant Thicket reservoir and in the reject water released to the sea is the subject of our ongoing Environmental Impact Assessment – which will be published as part of our planning application, which we expect to submit later in 2025.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England’s Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. |

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| | | We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |
| WRMP1044 | I hope you are listening to consumers' concerns. I am particularly concerned about the proposal to allow Souther Water to treat sewage effluent to produce our drinking water. Having experienced their woeful lack of success in treating the waste water that flows into Chichester Harbour, which is now catastrophically polluted and is killing wildlife and harming residents, I have zero confidence that Southern Water is competent to treat waste water well enough to produce drinking water.<br><br>The process is complex and there are many stages when human error or negligence could cause it to break down.<br><br>We are currently in a declining/failing situation as far as retaining our SSSI status. We have massive erosion of sea grass and salt marsh, because of sewage and farming polllution. Our statistics for chemical and biological pollution (as proven by our recent citizen science project) are abhorrent. All of this is caused by Southern Water failing to treat effluent well enough to discharge into the harbour at a level that is safe for wildlife and recreational use. How on earth do you think that the same organisation is capable of treating effluent well enough to provide drinking water? | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We note the objection to the use of recycled water in Havant Thicket. We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/<br><br>The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely |

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| | This proposal beggars belief and I heartily recommend that you think again. | upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here:<br><br>https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ |
| WRMP1045 | No comment Made | Thank you for reviewing our rdWRMP24 and providing feedback. |
| WRMP1046 | I write to object strongly to the proposals by Southern Water to build and operate an Effluent Recycling plant and operation.<br><br>I have read and noted the points set out in the two documents prepared by Havant Matters - https://havantmatters.org/water/key-concerns/ and https://havantmatters.org/water/wrmp2024/<br><br>These two documents overwhelmingly show that this is an inappropriate scheme, badly planned. Our environment needs us to take steps that are designed for the future, not a scheme that is there to generate profits for the company and its shareholders, but which have a significant impact on the local neighbourhood, environment and people.<br><br>I am sure that you have received many emails citing the arguments in these documents, and will be aware of the contents. I would simply say that I agree with most of the points made, and feel that we need the company to be brought to heel and required to reconsider these plans taking far more account of the people, neighbourhood and environment. | Thank you for reviewing our rdWRMP24 and providing feedback. Your objection to the use of recycled water in Havant Thicket has been noted.<br><br>We note your reference to the documents prepared by Havant Matters. The response to which can be found in Annex 4 of this statement of response.<br><br>Our Water Resources Management Plan follows the framework provided by our regulators, which emphasises the need to not only secure a water supply but to benefit wider society and the environment. This means that we need to leave more water in the environment which requires us to innovate and consider water supply and storage options that have not been traditionally used, such as wastewater recycling in order to meet future demand.<br><br>We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply for future generations means that all viable schemes need to be considered. The potential drawbacks of all options are considered in view of the proposed benefit it delivers.<br><br>Our website will contain the development of our WRMP24 and, going forward, our WRMP29. |
| WRMP1047 | I am writing to object in the strongest possible terms to Southern Water's revised draft Water Resources Management Plan for the following reasons: -<br><br>It is inconceivable to me that Southern Water (SW) should consider mixing recycled effluent with the chalk spring supplying the Havant Thicket reservoir. Why should customers be forced to: -<br><br>· Drink this product?<br><br>· Pay the additional costs of building a complex high-risk system and the costs to run it?<br><br>This project is supposed to be a drought resource which would only be needed in times of extreme water shortage. However, to maintain readiness for an emergency the pipes and filter membranes will have to operate continuously every day at the optimal operating condition. To do this SW will need to process and pump around it's system a volume equivalent of 12 Olympic size pools of water a day. It is understood the energy cost alone would be £3 million pounds per year in a normal year (i.e. not in a drought). | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>We consider all options as part of our options appraisal process. The scheme ultimately selected in the plan represents, in our view, the overall best value for the customers and the environment in terms to being able to meet the anticipated demand, resilience to climate change and delivering Environmental Destination.<br><br>- The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this.<br><br>- The way that the water sector is operated and regulated in England and Wales means that the costs for all schemes are ultimately recovered through customer bills over a period of time. This is true for the HWTWRP as well. |

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| | Despite the complexity of the new treatment process, which is new to the UK, and the risks to the reservoir if SW fail to maintain the treatment plant, no independent monitoring is proposed.<br><br>Money invested in effluent recycling becomes redundant when the plant comes to the end of its life in in approximately 60 years time. Upgrades and replacement of electrical & mechanical plant are needed every 10 to 20 years. Whereas a winter water storage solution, such as a reservoir, works with climate change and will still be in there in 200 years time. A reservoir solution also provides better value for money and more environmental benefits, as well as potential benefits to reduce winter flooding.<br><br>I have concerns about the impact of more concentrated reject water from the effluent recycling process being discharged in to the Solent via the existing Eastney Long Sea Outfall. The SW assessment indicates a 'likely significant effect' in their Preliminary Environmental Information Report published with the consultation.<br><br>Also I am concerned at the significant risk of leachate and landfill gas being mobilised by piling and tunnelling, required to build the recycling plant, through the waste into the chalk aquifer below – groundwater flow in the aquifer is to the south (i.e. flowing towards Langstone Harbour).<br><br>It is a retrograde step to drive people away from tap water to bottled water. In California and Singapore water recycling is used and many people have changed to using bottled water.<br><br>SW lose 100 million litres of water every day to leaks, that is 19% of all the water they abstract from the environment, which customers pay to treat, wasted through leakage in their distribution system. Their slow programme for improvements means even by 2050 they will still be leaking about 10% of all the water they treat, including the new water manufactured at huge cost from their planned new effluent recycling scheme.<br><br>The company is allowed to make a profit from building the new infrastructure. There is real concern that rejection and selection of water resource options is being driven by the search for profit, as the current funding mechanism incentivises water companies to develop infrastructure heavy solutions like effluent recycling, which allow them to make more profit, rather than developing more sustainable solutions.<br><br>SW should actively investigate more viable alternative solutions. England receives plentiful rainfall and SW should consider storing this in additional reservoirs which would cost less to build, less to maintain, uses low risk technology and have a lifetime of hundreds of years.<br><br>This proposal by SW is indicative of a company driven by profit with no regard to how it treats its' customers, the environment, or future generations. Further, SW's ability to plan a viable maintenance schedule going forwards needs to be looked at by government and changed ASAP. UK utility companies should not be able to hold the government to ransom by threatening bankruptcy if their working practices are challenged in any way. | Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter. Water recycling inevitably uses more energy and is subsequently more expensive to operate than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>The HWTWRP scheme uses global best practice with a multi-barrier approach and monitoring to ensure that the water quality is exceptional when transferred to Havant Thicket reservoir. The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. The water recycling plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The Environment Agency will determine the permits for the release of purified recycled water into Havant Thicket reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>A Water Recycling Plant would be typically expected to last 60 plus years but have a number of upgrades every 10-20 years of the electrical and mechanical plant.<br><br>We are planning to build two reservoirs; the Havant Thicket Reservoir with Portsmouth Water and SESRO together with Thames Water and Affinity Water. Our plan also includes provision for building another one in Sussex. We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs. Reservoirs require a unique set of geological, geomorphological and hydrological settings to be viable. A Chalk Managed Aquifer Recharge (MAR) scheme (feasibility trial) is considered for South Hampshire. Lower Greensand Aquifer Storage and Recovery (ASR) schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning.<br><br>We note your concerns about the reject water and A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice |

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| | | measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>The investment model needs to objectively select options based on standardised input criteria. It cannot be configured to preferentially select either smaller or larger options as that will lead to biased results and it cannot be demonstrated that the preferred plan is either least cost or best value. It does select drought options in preference to large infrastructure schemes and that is because drought options typically do not have large CAPEX expenditure. This is explained in further detail in Annex 20 of our rdWRMP24 (section 6).<br><br>Ofwat regulates the amount of money that water companies can charge the general public for their services through their Price Review, with the most recent being completed on 19th December 2024 (PR24). The Price Review is based on water company business plans for the next 5 years, which are informed through the Best Value Plan outlined in the Water Resource Management Plan. Ofwat also regulate the amount of profit that water companies can make, which for the next 5 years cannot exceed 4.03%. This is the maximum profit a water company can make and various Price Control Deliverables set by Ofwat ensure that water company poor performance is reflected in a reduced profit margin and fines.<br><br>We have dedicated budget for both proactive and reactive maintenance work and the budget is periodically reviewed to prioritise key maintenance activities. |
| WRMP1048 | We would like to object to Southern Water's water management plan for the following reasons:<br><br>Southern Water should first address the mind-blowing wastage of water through leaks. Customers are currently paying for SW to lose 20% of the water that they collect.<br><br>This is a very expensive project, cheaper, greener and more sustainable alternatives have been discounted or not properly investigated. It would seem that it is because they may not make as much profit for the company. There needs to be consultation on the whole range of options for water security. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward. |

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| | This is a top-heavy, over-engineered and energy-intensive project designed to make maximum profit for Southern Water rather than making best use of natural water. Not only are the costs huge, but the project, with a 24/7, 365 days a year pumping requirement, does nothing towards a sustainable energy future.<br><br>Southern Water do not have a good reputation in terms of water management. Their constant dumping of sewage into our harbours has angered most people so their ability to manage a project like this with no accidental contamination could be highly questioned. Many people will turn to bottled water rather than use this type of tap water, creating even more plastic waste.<br><br>This scheme does nothing about the problem of sewage discharges into our harbours – indeed, by building the water recycling plant on land that is an historic landfill, we further increase the problem of environmental damage from our water industry. Rejected water from the water recycling plant is even more contaminating than the sewage already regularly dumped in the harbours.<br><br>We are supposed to be searching for ways of reducing our carbon footprint and address climate change and this project does neither, better ways could be used to overcome our water supply issues whilst addressing both these issues.<br><br>Another possible solution that is not adequately considered is to move river abstractions to the tidal limit on the rivers Itchen and [redacted]. This has the effect of protecting the freshwater sections of the rivers and restoring natural flows. This is much simpler, and an added benefit is that because it is much closer to water treatment works and so requires fewer kilometres of pipeline.<br><br>We are not a drought-ridden country. Recent flooding in many parts indicate this. Our challenge is to capture and store winter water for use in dry summers. The building of reservoirs and confined aquifers would do this, as well as help to alleviate flooding in at risk areas. | With regard to the potential to develop small sustainable schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>Water recycling inevitably uses more energy than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were. As WRMP24 options are constructed, our baseline emissions will evolve. This may increase our total emissions as infrastructure projects with higher carbon costs, such as water recycling plants, are introduced. We will need to continuously adapt our solutions to reach and maintain operational Net Zero, while driving down embodied emissions through our supply chains as much as possible. We are firmly committed to reducing the greenhouse gas emissions released through delivery of our essential water and wastewater services. Our Net Zero Plan outlines the actions we are taking to reduce our carbon footprint, while also supporting the realisation of wider, long-term decarbonisation commitments, including the UK Government's legislative target to reach Net Zero by 2050. The actions set out in our Net Zero Plan will be key to mitigating the greenhouse gas emissions associated with the options we have proposed in our WRMP24 strategy.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers: https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/. Customer insight locally and nationally shows broad support for water recycling. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Our Water Resources Management Plan covers our plan for provision of drinking water. Our treatment processes are designed to treat the water quality found in the water sources we rely |

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| | | upon. For further information on sewage treatment please refer to our Drainage and Wastewater Management Plan which you can find here: https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/. A further consultation on water quality was held in March-April 2025. This included details of the likely impacts on water quality in Havant Thicket reservoir and the Solent and potential mitigations.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW.<br><br>Concerning the carbon impact of large infrastructure schemes, through the Water Industry National Environment Programme (WINEP), investigations are carried out to determine the sustainability of water company abstractions. Following these investigations the Environment Agency will change licences where necessary to achieve sustainable abstraction. As a result, in some areas, water companies need to look for alternative sources of supply. In some cases, this will necessitate investment in new large-scale infrastructure schemes which, whilst having a benefit to long term security of water supply and the protection of freshwater ecology and habitats, could have an increased carbon impact.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see here. We are planning to build new reservoirs where feasible. This includes the Havant Thicket Reservoir, the South East Strategic Reservoir Option (SESRO) and the River Adur Offline Storage. However, these will be insufficient to provide the volume of water to meet supply-demand balance in future. The HWTWRP is needed to provide the additional volume needed to maintain supply-demand balance and also offers greater resilience in the event of a prolonged drought. We will continue to explore options for additional reservoirs across our supply area for our next plan. A Chalk MAR scheme (feasibility trial) is included in our plan for South Hampshire. Lower Greensand ASR schemes are more challenging to manage and operate for water quality reasons, and they tend to have much shorter asset lives. Though we will be continuing to revisit and review the potential wider use of both MAR and ASR again, within future resource planning. |
| WRMP1049 | I am strongly opposed to the proposals in Southern Water's plans for the next five years. They are both expensive and carbon intensive and do not offer the kind of protection we would expect to see for our local environment. | Thank you for reviewing our rdWRMP24 and providing feedback.<br><br>The National Framework, Water Resource Planning Guideline and other supplemental policies all recognise the need for water resource plans to not only secure a water supply but |

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| | We are faced with a range of issues which need addressing: pollution in our rivers and harbours, dealing with storm surges, flood risks, leaking pipes, over extraction from our precious chalk streams and over consumption of water generally.<br>These require an overall plan which is based on sustainability and protection of the environment. We do not need expensive solutions like water recycling; there are plenty of other options which work with nature and do not threaten our local waterways and harbours.<br><br>Southern Water made a material change in their plans from desalination to effluent recycling since the last plan was issued but they did not carry out a full review or undertake a statutory consultation. This, together with limited consultation, is really unacceptable. I would like to see a plan which deals with all the related issues, restores life to our rivers, ensures a secure future for marine life in our harbours and promises us safe drinking water.<br><br>At the moment, our water is wasted both by leaking pipes and failure to store winter rain. It is also wasted because people are not encouraged to save water. Smart meters and better use of grey water would both prevent the need for expensive solutions like the plans for water recycling.<br><br>I recognise that there may be times when water is in short supply but climate scientists predict heavy winter rainfall so I really believe that a better option is storing rain which is being wasted at present. Also, Havant Thicket Reservoir is designed to cope with a one in 200 year drought. Surely we can supplement this?<br><br>I am also concerned that Southern Water is over estimating its projection of population growth and these figures need careful monitoring.<br><br>At the moment, we only collect about 1% of the rain which falls in the UK and this could be stored in ways that would prevent flooding. Also, at the moment Southern Water's record on reducing leakage is poor and needs to be much more ambitious. More than 100 million litres of water are lost every day and they should be delivering a much faster program of renewing pipe networks. Having a replacement rate of just one in 1,000 years when the water main is only designed to last a hundred and twenty years is unacceptable.<br><br>I am particularly opposed to the plans for water recycling at Broadmarsh in Havant for the following reasons.<br><br>1. This is an unnecessarily expensive and carbon intensive project. It would be much cheaper to look at ways of storing winter rainfall. The predicted cost is £1.2b and this money it could be much better spent. We also need a strategy which prioritizes low energy solutions. The energy alone for the Hampshire scheme will cost more than £3 million a year to run and then pipe the water to [redacted]. This is surely an unnecessarily expensive drought resource.<br><br>2. The nature of the reverse osmosis process means that it is required to run continuously. In Havant's case this will produce 30 Mld of water 365 days a year to avoid damage to | to also add to wider environmental and societal benefit. Our Water Resource Management Plan not only has to look at our water needs for the next 5 years, but needs to look ahead as far as 2075. This means we need to understand changes to our water supply needs and impacts from climate change and population growth. In addition, all water company Water Resource Management Plans now need to leave more water in the environment for the benefit of our plants and wildlife. This means that water companies now need to look at water supply and storage options that have not been traditionally used, such as water recycling and desalination. We understand that some customers may not agree with some of the proposed schemes in our plan, but the challenges we face finding a sustainable water supply into the future means we need to look at all viable schemes and will have to make decisions with the support of our national Government and industry regulators which benefits all society.<br><br>With regard to the requirement for a full statutory consultation following the removal of the West Southampton Coast desalination option, the deselection of West Southampton Coast desalination was taken at Gate 1 of the RAPID process (outside of WRMP) in September 2021. Southern Water was then instructed by the Secretary of State to submit a draft WRMP in June 2022 (compared to October 2022 for other water companies), beginning in 2023 and covering 27 rather than 25 years. We consulted on our draft Water Resource Management Plan 2024 (dWRMP24) in 2022-2023 and, following changes, we consulted on our revised draft WRMP24 in 2024.<br>We provide non-potable supplies to some large industrial users. However, it is not feasible for us to provide dual supplies, potable and non-potable, to each of our customers. This will also require the entire housing stock across our supply are to undergo modifications in internal plumbing. We do not consider this to be a realistic option. We are working with developers to recycle as much water as possible on new developments at the site level. All our meters going forward will be smart meters. We plan to replace all our existing meters with smart meters by 2030.<br><br>For dWRMP24 we, together with the other WRSE companies, commissioned Edge Analytics to provide growth forecasts for all companies, in line with government guidelines. Edge Analytics used the latest available local plan data, as well as data from the Office for National Statistics (ONS) and the Greater London Authority (GLA), to produce projections at a WRZ level. Separate forecasts were developed for total population, household population, non-household population, dwellings, dwellings occupancy, population in commercial properties and business counts. Following the publication of latest WRPG in March 2023, we commissioned an update to that forecast (along with other WRSE companies), which enabled us to consider growth under five different projections based on data from Local Authorities, ONS and OxCam. We have not based our plan on a single population forecast but have used a range of population forecasts to determine the nine future supply-demand balance scenarios that we have planned for (see Section 5.5.3 of the rdWRMP24 Technical Report). The estimates of future population growth range is from 7% to 34% growth at the company level between 2025 and 2075. The range of growth forecasts considered each of our WRZs is shown in Section 2 of Annex 7 that accompanied rdWRMP24 Technical Report. As part of our |

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| | membranes, pipes and pumps. Many people have grave concerns about Southern Water's ability to maintain this without causing pollution.<br><br>3. This plan will have negative environmental impacts around Langstone harbour, the Solent, Havant Thicket Reservoir and the pipeline route. I am particularly concerned about the waste material from the treatment process being discharged into the sea with its likely concentration of pesticides, pharmaceuticals, forever chemicals and chemical disinfection products.<br><br>4. It seems that no independent monitoring of the discharge into the reservoir is planned. it's important to realise how little trust local residents have in Southern Water, following years of unnecessary discharges of effluent into the Solent<br><br>5. We are losing a unique biodiversity opportunity to create a chalk spring fed Reservoir which is of course what people were promised.<br><br>6. The proposed site at Broadmarsh is on a landfill site full of contaminants and very close to the sea. The plant will require deep piling and tunnelling and so is likely to release toxic leachate into the harbour. (This seems already to be happening) It will also have a significant visual impact on the coast.<br><br>7. Why has the option of recycling effluent at [redacted] been shelved.<br><br>8. Southern Water seems not to have considered (or put forward to the Environment Agency), alternatives like winter storage. A full review of options should be a matter of urgency. Solutions like small storage areas and moving abstraction from the chalk streams to near the tidal limit could be implemented very rapidly. So could the construction of new reservoirs such as the river Adur offline reservoir in West Sussex<br><br>9. Not only were alternative schemes not considered but Southern Water unnecessarily withheld 12 volumes from public view so campaigners have been unable to see useful details on options and environmental assessments.<br><br>10. I am concerned about the cost of the water recycling process and the effect on consumer bills. We are told that the recycling scheme alone will deliver a profit of about £45 million to Southern Water. This not a good way to deal with the range of issues I have listed.<br><br>11. What about the quality of the water we will be expected to drink? Surely, many people will refuse to drink tap water and we will be presented with even greater problems from plastic bottles.<br><br>Please reject this plan and ask Southern Water to think again. | adaptive planning approach, we will track population growth and switch to the most appropriate supply-demand balance situation.<br><br>We have been promoting the use of water butts since we started implementing our universal metering programme back in 2010. This included offering water butts at subsidised rates. We will continue to encourage and promote rainwater harvesting, including financial grants to community level initiatives.<br><br>Regarding reservoir storage, they require a unique set of geological, geomorphological and hydrological settings to be viable. Our plan includes building two reservoirs (Havant Thicket Reservoir and SESRO) with the possibility of building a third (River Adur Offline Storage). We have considered a number of storage options in the past and will reassess them for WRMP29 in addition to considering locations for new reservoirs.<br><br>The leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>1) We carry out an options appraisal exercise when we update our plan every 5 years. This exercise is usually carried out by an external consultant and looks at new options as well as options that were previously considered but were not taken forward for a variety of reasons. Cost is one of the factors considered in the options appraisal process but is not the only determining factor. We have also looked at factors such as volume of water that an option can provide, its resilience to climate change, environmental impact etc. in addition to capital and operating costs. The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.<br><br>2) Water from the water recycling plant will be used all year round to supply Southern Water customers, following further environmental restrictions including abstraction limitations from Natural England's Common Standards Monitoring Guidance conditions. These conditions set new year-round flow targets for the River Itchen and proposed targets for future implementation on the River Test, reducing the water available, both in the summer and winter.<br><br>The advanced treatment processes used in water recycling, including reverse osmosis, are used around the world to remove nutrients, pharmaceuticals and other impurities from water to create purified recycled water. |

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| | | 3) A further consultation on water quality will be held in 2025. This will include details of the likely impacts on water quality in the reservoir and the Solent and potential mitigations.<br><br>4) The Environment Agency will determine the permits for the release of purified recycled water into the reservoir and will monitor them. The Environment Agency ensure compliance of all discharges.<br><br>5) Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply.<br><br>6) Building on former landfill sites is commonplace and, when done carefully, poses little risk to the environment. SW has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. Any potential impact from construction or operation of the project, and proposed mitigation, is part of our ongoing Environmental Impact Assessment. Best-practice measures and construction techniques will be used to fully address any risks relating to the landfill. We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main statement of response.<br><br>7) Work formally paused on investigating and developing Fareham Wastewater Treatment Works as a back-up option in May 2023, in agreement with RAPID, and so we have not developed it to the same level as HWTWRP. A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. The outcome of the options appraisal process was supported by RAPID at Gate 2. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), and were able to meet the identified future need of up to 90Ml/d, HWTWRP presented significantly better value for customers and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, the focus was on progressing HWTWRP as the selected option.<br><br>8) With regard to the consideration of small storage schemes, we have to meet very challenging demand management and Environmental Destination targets set by the Government. The resulting scale of supply-demand balance deficits requires us to be ambitious as well as innovative to meet future challenges. Environmental sustainability is a key criterion for including options in our plan, regardless of the size of the option.<br><br>We have considered the relocation of existing surface water abstractions to new abstraction points further downstream, closer to the tidal limit. For example, we considered relocation of the River Itchen WSW abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This not viable because of |

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| | | the reduction in abstraction licences on the whole river and groundwater system and because of the impact on migratory fish.<br>9) Regarding transparency, our Statement of Exclusion published on our consultation web page (see below) detailed those documents that were not published online due to material being commercially sensitive, or restricted under section 37(B) of the Water Industry Act 1991, or 'the Act' (as amended by the Water Act 2003). We are required to make sure that all published documents comply with the Security and Emergency Measures Direction (SEMD). Restricted documents/ sections are available for view via appointment in our head office in Worthing. For the fdWRMP24 we are making as many of the documents available on our website as possible although some information has been redacted so as to comply with SEMD and, in line with guidance, we do not publish any material of a commercially confidential nature.<br><br>10) Water recycling inevitably uses more energy and subsequently has a higher cost than conventional sources of supply such as groundwater or rivers, due to the advanced treatment techniques used. However, those conventional sources are no longer available to us as they once were.<br><br>Just like water across the country has its own distinct taste influenced by the geology of the local area, the water taken from the reservoir may taste different from existing supplies due to the spring water being open to the elements. The taste would also vary if recycled water is added, but the water at customers' taps will continue to meet strict drinking water quality standards and be wholesome to drink. We are working closely with international experts, regulators and environmental organisations to develop the plans and ensure this. We don't expect customers to buy bottled water when the clean, wholesome water coming from their taps continues to meet strict UK water standards and is many hundreds of times cheaper.<br><br>We know our past performance was not good enough and we have apologised for that. We also know that as a direct result of not meeting customer expectations, we have a lot of work to do to rebuild trust with our communities. This is why we have been working hard to deliver our Turnaround Plan, for a short sharp improvement in performance across the board, and why we have set out our most ambitious investment programme ever for the years ahead after listening to our customers:<br><br>https://www.southernwater.co.uk/about-us/our-plans/turnaround-plan/ |
| WRMP1050 | I have recently learned of Southern Water's proposal to use effluent recycling to supply water to augment our future water supply. I am particularly concerned that having just learned about this initiative the closing date for consultation is the 4 December (i.e. almost immediately). My understanding was that the new reservoir being constructed at Havant Thicket was to use water from traditional sources, such as local chalk springs. I now discover that it is going to be part of this scheme, storing recycled effluent.<br><br>My fundamental objection to the proposal is that it does not make intuitive sense to recycle effluent in a country where there should be adequate fresh rainwater, especially as recent | Thank you for reviewing our rdWRMP24 and providing feedback. We note your concern to the use of recycled water in Havant Thicket.<br><br>We fulfilled the expectations from planning guidance regarding our visibility, but we welcome suggestions as to how you would like to see our engagement develop, and we will take that on board for future consultations.<br><br>The selection of Hampshire Water Transfer and Water Recycling Project (HWTWRP) followed a thorough options appraisal process carried out as part of the Regulators' Alliance for |

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| | indications suggest winter rainfall levels are rising. Rather than embarking on a massive construction project with all the adverse environmental impacts, a more sustainable solution would be to reduce leakages in the current pipework system.<br><br>Southern Water, in common with many other water companies, have a poor record on environmental safeguarding and I fear that this project, using an untried method in the UK, may produce new adverse impacts | Progressing Infrastructure Development (RAPID) gated process. Southern Water's Gate 1 and Gate 2 submissions to its regulators in both 2020 and 2021 confirmed investigation of alternative options for both water recycling and water transfers involving Havant Thicket Reservoir.<br><br>Our supply area is classed as being under 'serious water stress' by the Environment Agency. Please see here. Supplementing Havant Thicket reservoir with purified recycled water will create a new sustainable source of supply. Water recycling is widely used around the world to create a new source of supply that means less water needs to be taken from the environment supporting wildlife, particularly in a drought.<br><br>Regarding leakage reduction, the leakage reduction target set by the Government is 50% by 2050. We are planning to go beyond the target and reduce leakage by 53% by 2050. The target is based on what can realistically be achieved with existing technologies and includes a mains replacement programme that will see the length of mains replaced increase significantly over each successive 5-year planning period. We will be looking at emerging and new technologies in this field with the aim of using of them if they can deliver quicker and/or greater reductions in leakage going forward.<br><br>Regarding possible operational issues, the plant will monitor the quality of the treated effluent from Portsmouth Harbour WTW and will shut down if this moves outside of the treatable parameters. The recycled water will also have a lower nitrate level than the spring waters, due to the treatment at Portsmouth Harbour WTW. |