



Partnership for South Hampshire

Office of the Executive Leader, Fareham Borough Council,
Civic Offices, Civic Way, Fareham, Hampshire PO16 7AZ
T: 01329 824752 M: 07825 300637
email: swoodward@fareham.gov.uk

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Partnership for South Hampshire response to the Southern Water 'Water for Life' consultation

Introduction

1. This response to the Southern Water 'Water for Life' consultation has been prepared by the Water Quality Working Group of the Partnership for South Hampshire (PfSH). PfSH is a strategic partnership of twelve local authorities around the Solent working co-operatively on strategic/sub-regional planning, development, and environmental matters.
2. PfSH welcomes the opportunity to the Water for Life consultation on the 'Base Case' proposal for seawater desalination at Fawley. The consultation will help to inform the next key decision point which will help to determine whether this project, or one or some combination of the identified fall-back alternatives, is progressed. All relevant planning authorities in South Hampshire should be engaged by Southern Water as part of the development of their plans.
3. Whilst the consultation is focussed on desalination or fall-back alternatives, the options considered as part of this consultation will need to continue to be seen as part of the wider package of measures to ensure sufficient water resources are available to meet the needs of the environment as well as of those of customers. This includes the efficient use of water resources, reducing leakage and enhancing the resilience of the network.

The security of future drinking water supply for southern Hampshire requires urgent resolution.

4. PfSH both acknowledge and emphasise the urgency of Southern Water's water supply position and the importance of resolving the supply deficit by bringing significant and sustainable new sources of water supply forward as soon as possible, and by the 2027 date agreed under best endeavours.
5. The consultation document correctly highlights the need to abstract less water from the sensitive chalk stream habitats of the Test and Itchen rivers and more from sustainable, resilient sources instead, following the 2018 legal agreement between Southern Water and the Environment Agency.
6. A resulting supply deficit in drought periods of 190 million litres per day is identified, equivalent to the usage of approximately 150,000 people, particularly affecting South West Hampshire.
7. The Base Case desalination plant (or fall back alternatives) in the WfL consultation would meet about 40% of the deficit, so it is essential that there is a high level of confidence in and support for the scheme that is ultimately progressed.

Carbon neutrality objectives should be more prominently factored into the evaluation and decision-making process.

8. The UK has committed to achieving carbon net zero by 2050 with accelerated interim carbon reduction targets for 2030 announced recently. Much of South Hampshire has declared a Climate Emergency.
9. Both desalination and waste water recycling are comparatively energy intensive and high carbon emitting water supply solutions, and desalination is generally understood to be the more energy and carbon intensive process of the two. If there are feasible lower carbon alternatives, there is a judgement to be made in the context of wider sustainability considerations about whether high carbon-emitting water supply solutions should continue to be considered.
10. It is not possible from the material published to date to meaningfully compare the Base Case performance in this regard relative to the fall back alternatives. Given the long term implications of the decision to be made, the relative carbon merits of the Base Case and alternatives should be made transparent and feature more prominently in the option evaluation and decision-making process.

Significantly more work is required to demonstrate that the Base Case desalination plant is a sustainable water supply option that can be delivered on time. Significantly more work is required to develop the fall back alternatives to a comparable level of technical detail, in case the Base Case proves not to be.

11. The Base Case appears comparatively high-impact and high-risk relative to some of the alternatives, based on the limited high-level evidence published to date. It is the only scheme option where the main plant is proposed to be located within a National Park. It appears to entail more significant, permanent intrusion into, and ongoing operational impact on, European designated sites than the fall back alternatives. For both these matters national policy requires detailed consideration whether there are feasible alternative solutions or project locations which would be less damaging.
12. The identified Base Case location is in the New Forest National Park Authority and New Forest District Council area. Both authorities are members of PfSH and PfSH notes that their individual authority responses do not support the Base Case, identifying other risks and impacts to the higher level points made in this PfSH response. These may require more detailed evaluation including in relation to deliverability of the Base Case scheme by the required date, 2027.
13. It will be essential to undertake all appropriate surveys to ensure full consideration of impacts associated with the Base Case. All the currently identified options need to be more fully developed to mitigate delivery risks in the Base Case, and to enable regulatory decision makers to determine how best to ensure sustainable, secure and timely enhancement to drinking water supply for southern Hampshire.
14. **Wastewater recycling alternatives offer scope to reduce nitrate discharges to the Solent, a significant benefit not captured in the analysis of alternatives opportunities to date.**
15. The consideration of wider benefits forms part of the evaluation process for water supply solutions. This reflects a recognition by government and water industry regulators that water companies have a role to play in the 'green economic recovery'

to help the country to meet the economic and social challenges of the COVID pandemic¹.

16. The need to mitigate the impact of additional nitrate discharges from housing development on European designated sites in the Solent is the number one barrier to the delivery of much-needed housing in much of the Hampshire area. The current backlog is estimated to be around 2,000 homes, with critical social and economic implications. In recognition of the significance and challenge the issue poses locally, DEFRA is funding a £4.2m pilot study to develop a nutrient trading platform in the Solent.
17. The fall back alternatives to the desalination Base Case include various permutations of water recycling, up to 75 million litres per day. If operating full-time at the upper capacity level, water recycling could divert wastewater discharge to the Solent that would contain 220,000 kg total nitrogen per annum².
18. At an illustrative 20% of this theoretical level of wastewater effluent reduction, the reduction in nitrogen discharged could provide sufficient offsetting headroom for all or most committed and planned housing development in the PfSH area for the next decade. The nitrate offsetting credit value of around £100m at current market rates could help fund the project, and the wider environmental, economic and social benefits would be very significant.

For enquires regarding this response please contact Mark Williams, Planning Policy Officer at New Forest District Council mark.williams@nfdc.gov.uk

ENDS

Kind regards



Councillor Seán Woodward
Chairman, Partnership for South Hampshire

¹ [Green economic recovery – the water industry's role in building a resilient future](#), July 2020.

² Published Environment Agency monitoring data indicates that the average total nitrogen level in treated effluent discharge from Budd's Farm over the preceding three years is 8 mg/l. The figure stated is based on 100% capacity operation at 75 ml/d, 365 days per annum.

About the Partnership for South Hampshire (PfSH)

The Partnership for South Hampshire (PfSH) is a partnership of twelve councils and a national park authority that works with a wide range of other agencies to help deliver sustainable economic growth in South Hampshire. The partnership comprises the following organisations:

Eastleigh Borough Council
East Hampshire District Council
Fareham Borough Council
Gosport Borough Council
Havant Borough Council
Hampshire County Council
New Forest District Council
New Forest National Park Authority
Portsmouth City Council
Southampton City Council
Test Valley Borough Council
Winchester City Council



Formed in 2003, PfSH has a strong record of facilitating strategic planning at the sub-regional level. PfSH plays a pivotal role in policy formulation related to strategic planning, housing and regeneration as well as producing a range of robust evidence base studies. PfSH has agreed a Statement of Common Ground which sets out the issues to be addressed and the process to review and replace the 2016 Spatial Position Statement with a new Joint Strategy.