

# Rowlands Castle Parish Council

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## Collation of RCPC's Responses to Questionnaire for WRSE Consultation

By RCPCllr Chris Stanley, 14 March 2022

### **Please tell us about the type of organisation you represent**

Local authority (elected member)

### **If you said 'Other' in the previous question, or would like to provide further information, please tell us more below.**

I am the Chairman of Rowlands Castle Parish Council and am completing this questionnaire on behalf of the full Council

### **Questions from the Consultation document follow**

**Q1. Abstraction reduction to protect the environment is likely to be the single biggest driver of investment in water resources over the next 25 years.**

**Do you agree with our approach to establishing the appropriate level of abstraction reduction required across the South East England?**

**Please explain your answer.**

Yes the Parish Council agrees with your approach because it is essential to reduce abstraction that causes problems for wildlife and the environment

**Q2. We would like to hear your views on how we prioritise where abstraction is reduced.**

**Please score the following criteria from 1 to 7, with 1 being the least important and 7 being the most important:**

**Prioritise upper catchments, because headwater ecologies are the most vulnerable and the benefits to flow should improve the whole catchment.**

7

**Prioritise catchments where the impacts on flows are the most severe.**

6

**Prioritise catchments where there is the highest degree of certainty that abstraction reduction will restore flows and deliver environmental improvement.**

4

**Prioritise catchments where people have the most unrestricted access to rivers and streams.**

1

**Prioritise catchments where nature will benefit most, even if public access is restricted.**

5

**Focus abstraction reductions on a smaller number of catchments but fully address the issues they face.**

3

## **Focus on a wider range of catchments and partially address their abstraction issues**

2

### **Q3. Are there any other factors that you think should be considered as we prioritise where abstraction could be reduced in the future?**

Yes. The distance of the abstraction points from the areas where the water will be used (residential areas and industry) should be as short as possible to reduce the length of pipelines that have to be built. In addition, account should be taken of any particular issues on specific rivers and streams where a seemingly good abstraction point may really affect the environment and or biodiversity

### **Q4. We have assessed the future water needs of the other sectors that don't rely on the public water supply provided by water companies.**

#### **Do you agree with our assessment? Please explain your answer.**

The assessment seems reasonable but it is important that the other sectors apply their own processes to reduce consumption if possible and to also add collection and storage capacity using rainfall as the source

### **Q5. We've described our adaptive planning approach and the scenarios we've included in our adaptive planning pathways.**

#### **Do you agree that we have planned for the right scenarios in each of the pathways, with a wide enough range for each of our key challenges, through our adaptive planning approach? Please explain your answer.**

Yes. It is considered you have chosen reasonable scenarios given that there is considerable uncertainty about future climate changes

### **Q6. Do you support our approach to treat each pathway as equally likely and not choose a core pathway beyond 2040? Please explain your answer.**

Yes. With 18 years still to go before 2040 much could change wrt climate effects on rainfall and also how people use water once they realise the potential for shortages in the future and have meters to help them understand their usage. It is also necessary to see how many more people are likely to live in the area over time. Overall it will be better to wait until at least 2030 and later if possible before making further assessment as to which pathway will most likely be appropriate

### **Q7. Do you have any other comments on our approach to addressing the challenges that are facing South East England?**

The most important thing that water companies and the Government must do is push out to everyone the message that water is precious and that ever increasing use will adversely impact its availability and the environment in which we live. Water must not be wasted, so repairing leaks and reducing them over time is the first critical action. At present there are still far too many leaks, forcing the need to do yet more abstraction and find expensive alternative means of providing more water. Education that can shape better behaviour is also very important and metering should be made mandatory for all households so that they can identify how much they use and hence how they could save. It is much cheaper to prevent overuse and loss than to build more resilience into the water supply system.

### **Q8. Reducing the demand for water through leakage and water efficiency activity contributes to more than half of the total amount of water needed in the first 15 years of the emerging plan. The balance then shifts to include a greater reliance on supply side solutions, particularly in the more challenging future scenarios.**

**Water companies are committed to delivering these reductions, but they are reliant on customers making sustained reductions in their water use over the long-term.**

#### **Do you think our plan strikes the right balance between demand and supply solutions and the risks associated with delivery of such solutions?**

**Please explain your answer.**

The plan seems to strike a reasonable balance but it is reiterated that rapid reduction of leaks from waterpipes, good education of users and mandated metering is essential to reduce usage in the first instance. Many people waste water such as by watering their gardens in the heat of the day and using hoses when cans would be better. Everyone should be encouraged to have at least one large water butt. In the home, power showers use a lot more water than gravity showers and this should also be made clear to homeowners..

**Q9. The plan assumes that the Government will introduce new policies that will support more efficient use of water across society - through labelling of water-using products by 2024, introducing a minimum standard for all water using products by 2040 and tightening the water efficiency requirements within the Building Regulations for new homes by 2060. Do you support these interventions and the timing of their introduction?**

**Please explain your answer.**

We support the introduction of new policies but believe the timescales are far too long. A minimum standard for all water using products could be brought in by 2030 if Government and the industry put their mind to it. 2040 is potentially too late and is not ambitious enough. Again, wrt tightening the water efficiency requirements within the Building Regulations by 2060, this is way too far in the future and a target of 2040 or even 2035 should be pursued. A water crisis could develop quite rapidly over the next 10 years and Government and the water industry should be ambitious in their aims, not making changes at a gentle pace.

**Q10. Do you think it is appropriate for Temporary Use Bans and Non-Essential Use Bans, that reduce demand for water further during droughts, to be used as options in this regional plan?**

Yes. It is important to have the ability to reduce water usage by a variety of means because we may run into real problems if there are not the means to reduce excessive consumption for periods of drought. We could run short of water quite rapidly if there is a prolonged period of dry water and high temperatures.

**Q11. Do you agree with the mix of options that provide new water supplies for the region within our plan - reservoirs, desalination, water recycling, new transfers, improved abstraction from groundwater storage and ASR schemes? Do you think that some options should feature more or less in our plan to secure future water supplies? Please explain your answer.**

We do not entirely agree with the mix of options discussed and we certainly believe that some options should feature more and others far less or not at all in the plan. The plan should not rely heavily on engineering solutions that are resource hungry and have both a massive carbon footprint to construct plus a long term ongoing chemical, energy and carbon operating cost. Effluent recycling comes under this heading as does desalination.

The first step should be to select options that reduce operational energy and carbon use, not increase it. Over a complete year we do seem to get enough rainfall for our needs, particularly in the winter, so a priority should be to collect and store it for the drier periods. Sustainable solutions would be to optimise all opportunities for storage of excess winter rain or river water in confined aquifers and create more storage facilities in the form of varied sized reservoirs for the excess winter supply. This in turn will reduce downstream flooding and create new bio-diversity opportunities. Once built, reservoirs will use little energy in comparison with daily recycling and desalination and, if sites are chosen carefully, may well be built with a low carbon usage in construction. Natural water transfer schemes may well be able to feed off these storage sites and need to be investigated in parallel with developing a reservoir strategy. The Regional Plan should be much more ambitious in selecting more sustainable options with good environmental benefit rather than relying on engineering solutions that will always demand large amounts of energy.

Because of the above, effluent recycling should be an option of last resort in the Regional Plan, along with desalination that has already been moved to this category as they use the same

chemical, energy and carbon hungry technology. It is essential to keep long term costs down as well as reduce energy demands, because consumers will need to be charged more for high energy use systems being employed. Once reservoirs and transfer pipelines have been built their energy costs are small in comparison. If effluent recycling is genuinely the ONLY viable option in an area the effluent should only be sources and recycled from close to where the water is needed, to minimise the distance over which it has to be moved. This is not the case for the first effluent recycling scheme selected, in Havant, where the water is actually needed in Southampton and will be pumped more than 35 km for more than 70 years. What is the sense in that!

Additionally, if effluent recycling is an option to be selected in the region then the sewage should be taken from a works where it will provide an additional positive environmental benefit; that is reducing the discharge of sewage into rivers or the sea. It must also be remembered that customers who are accustomed at present to drinking high quality water will need to be convinced that such water mixed with recycled water will still taste as good and be of the same high standard. We do not want people starting to drink more bottled water, which could very easily be the case with all the bad impact of single use plastics that would follow. We ask the question why effluent reuse from Peel Common STW (Fareham) to Otterbourne not being shown as an option in the Regional Plan when it is still being investigated by Southern Water as a viable alternative? Peel Common requires a shorter pipeline to Otterbourne and would provide more benefit in reducing the volume of sewage entering European Protected coastal sites via the long sea outfall into the central Solent than using sewage from Budds Farm. It should be noted that Southern Water's own reports confirm that there would be more environmental benefit in removing sewage for effluent reuse at Peel Common rather than taking it from Budds Farm WTW as the latter's outfall discharges further out into the open sea. The Southern Water Options Appraisal Process is not considered robust as the company has not thoroughly considered all of the available options to come up with the best value and most environmentally friendly plan.

#### **Havant Thicket Reservoir - Effluent Recycling Proposal - specific comments.**

The Parish Council does not support the proposal to store recycled effluent in the reservoir for reasons over and above our concerns expressed earlier about the high energy and carbon consumption of recycling schemes in general. We are very concerned that some significant adverse aspects of this proposal have not been fully considered in the regional assessment. The reservoir project as approved is planned to take high quality water from chalk aquifers and store it for use in the summer. In so doing the reservoir will provide a high quality environment that will deliver biodiversity gains of considerable value for wildlife and also for people. The recycling treatment process does not remove all the compounds from the sewage and so the reservoir water will be of a lower quality that increases the risk of significant algal blooms in the reservoir and poor downstream water quality in the streams below the reservoir and in the coastal waters from water leaving via the compensation discharge. The benefit that the reservoir is to have in reducing nitrates will be lost.

The previously planned annual seasonal variation in water level at the reservoir will be lost under the proposed operating regime to keep the reservoir full year round. This will have an adverse impact on many breeding species and reduce the value of the reservoir to birds migrating in the autumn. The original reservoir scheme provides a unique opportunity to create a special wetland environment with clean chalk fed water with the normal pollution load that most waters have. This opportunity would be totally lost.

The Habitats Regulation Screening Assessment and Strategic Environment Assessment undertaken by Southern Water for discharging treated effluent into Havant Thicket Reservoir is not robust and should not be relied on when assessing what options are viable in the Regional Plan. There is also no apparent limit to how much treated effluent may be discharged into the reservoir should this scheme go ahead and this could allow Southern Water to pump up much more than is acceptable, effectively trashing the reservoir environment.

Finally, the large community impacted by this particular effluent recycling scheme proposal has not had the same opportunity to comment on the Southern Water options proposal as other communities such as Fawley have had, as the Havant Water Recycling Scheme was not selected as a preferred option until AFTER the completion of Water Resource Management Plan 19. Information available at present following the publishing of Gate 2 in Dec 21 is so heavily redacted as to be meaningless to members of the public who might wish to study the detail. This may well be considered by some as a deliberate action to conceal information that would lead to local resistance to the scheme being strengthened.

In summary Rowlands Castle Parish Council believe the proposed recycling of treated effluent into the reservoir to be a very bad idea with high long term energy and carbon costs (that will have to be paid for by consumers), a negative impact on the environment and the potential for people to turn to bottled water because of the reduction in water taste and high quality. The Council requests that this particular recycling option be removed from the Regional Plan and not considered again.

**Q12. Do you support the use of new, potentially long pipelines to move water around the region?**

The answer to this question is a qualified yes. The use of pipelines to support water transfer is supported provided that each one is carefully considered for the benefit it will bring and the degree to which its completion will support the maintenance of water availability. It is recognised that some temporary disturbance to local areas will take place during construction but this can be supported by people if they see that the project has been carefully considered and the total benefit is made clear. Sometimes it might be better to have two indirect short pipelines with a length of river or canal in between to carry the water onwards, rather than one long pipeline. Each requirement for a long pipeline should consider this dual approach as an option.

**Q13. We have identified where water companies might investigate a number of new, more innovative nature-based solutions to improve the region's water catchments.**

**Whilst these options can provide multiple benefits, the fact they are still relatively new can make it more difficult to be certain of the benefits that will be delivered and the return on investment.**

**Do you agree that we should promote new, more innovative nature-based solutions in our plan to develop a better understanding of their future value and role in delivering water supplies and wider environmental improvements?**

Yes to a degree. General water retention methods should certainly be considered, particularly in upper catchment areas, where temporarily stored water can then be released downstream for use limited abstraction. This will require working with farmers and land owners to consider use of some of their land for water retention and storage. SuDs can also play their part by retaining water and then slowly releasing it into streams and rivers to supplement their flow down towards abstraction points. Both these methods reduce flooding at lower levels and retain water to sustain a better river flow. This would enable some abstraction in times of drought without environment degradation.

**Q14. Do you support our approach to stop using the majority of Drought Orders and Permits - only continuing to use a limited number during droughts until we achieve one in 500-year drought resilience, and stopping their use after 2040, unless we experience a drought more severe than a one in 500-year event?**

Yes if that works as part of the overall balanced plan to improve water availability without environment degradation.

**Q15. Overall, do you agree that the emerging plan, which presents the most cost-efficient adaptive planning solution, should be used as the basis to further develop our draft best value regional plan?**

In broad terms we agree that the plan can be used as a basis for future work but the need to reduce long term high demands for energy and carbon use must be factored in as a key point.

Thus recycling should be placed with desalination as the worst options to pursue and implementing processes to get consumption reduced significantly (much the cheapest option) be placed as an absolute priority. The construction of further reservoirs and other water storage and retention facilities together with appropriate transfer systems should be the next options to consider. The availability of energy is only going to get more challenging over the next century as is the need to reduce carbon use so the Regional Plan must place pure engineering schemes as options not to pursue unless no other schemes are available.

**Finally, do you have any other comments about our emerging regional plan? If so, please give more details below.**

It is essential that as the regional plan continues to be developed that residents of the region are given further opportunities to comment and that good complete information is provided to enable informed responses to be given. The public will support schemes where the evidence supporting them is clear and gives them confidence in the decision-making process. Attempts to drive through schemes that do not have wide-spread support will cause people to lose faith in the process, render it unfit for implementation and erode confidence in the companies involved.

Cllr Chris Stanley  
13 March 2022