

Timeline for reservoir & effluent recycling proposals
(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

Date	Activity	Additional information
2004-2010	Regular PW reservoir Stakeholder Group (SG) meetings	Attended by HBC officers, nominated HBC councillor, some ward councillors and county councillors. Regular updates provided. Workshop sessions included when key decisions needed to be made for the reservoir design. Discussions included options for access & the size of the reservoir.
2004	Ecological surveys commenced	Entec and ECOSA appointed to undertake ecological surveys, early environmental & engineering reports.
June 2006	Entec Report for PW on reservoir options	Stakeholders sent a report showing different reservoir options at Havant Thicket, varying in size and scope from large designs maximising yield, wetland and recreational area to smaller and separated areas that attempted to preserve areas of woodland, in particular The Avenue. Stakeholder workshop 30/6/06 attended by councillors and officers from EHDC & HBC, HCC, SCP Manager, FE, EA, H&IOW Wildlife Trust and CCW followed by a request for written feedback by 28/7/06. The stakeholder consultation did not identify a preferred option. On balance the view of stakeholders was that the yield, recreation & biodiversity enhancements of the larger options outweighed the loss of The Avenue, as long as the main woodland areas to the N & S were preserved, and the loss was addressed by tree planting. The visual aspect was considered important to ensure the embankments blend in with the natural and historic landscape. This feedback was used to develop a reduced setoff options.
Late 2007/ early 2008	Arup appointed by PW to undertake the outline reservoir design	Arup were appointed by PW to prepare an outline design and all the supporting documents needed to support a planning application to the LPA's.
April 2008	Public consultation on the reservoir proposal	Widespread public consultation by PW, letters to residents in Bedhampton, Leigh Park & Warren Park. Events in community halls and supermarkets. Engagement with local schools. Questions on the consultation related to the size of the reservoir, pipeline route, the level of recreational activity (low, medium or high). Dedicated project website made available with lots of information & consultation materials.
September 2008	Inlet/ outlet valve tower incorporated into embankment	Arup outline design drawings show the inlet/ outlet tower incorporated into the embankment avoiding the need for an offshore tower and bridge from the embankment. The latter was designed out due to concerns about this being a health & safety risk to the public, especially children.
September 2008	Newsletter published on outcome of public consultation	Newsletter published summarising the response to the public consultation, how PW had taken on board the feedback, and the proposed way forward. Notices were put up at the site and articles were published in community papers advising that the newsletter was available.
October 2008	Interim Report on Community & Stakeholder liaison published	PW produced and published an Interim Report on Community & Stakeholder liaison, setting out the information in more detail on how feedback had been taken on board. Circulated to SG and published on the Havant Thicket Reservoir website

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1 Dec 2008	Strategy for Community & Stakeholder Involvement published by PW	Revised and updated the Strategy for Community & Stakeholder Involvement. This was published on the HTR website on 1 December 2008
2011- 2016	PW SG meeting suspended; updates to stakeholders including HBC/HCC councillors on the SG continued by email when there was any activity to report.	As SW had not requested any water from PW to meet their demand deficit the reservoir scheme had to be put on hold, as PW could not justify the scheme to meet their needs until beyond 2030 following a change in the government guidance on how to calculate demand shortfalls and the impact of climate change. Work continued during this period with HBC/EHDC to ensure the reservoir remained in both LA's Local Plan, and a route for the pipeline was included in the HBC Local Plan.
2017	SW request a bulk supply from PW triggering the need for the reservoir	SW requested a bulk supply of 21Ml/d from the PW Gaters Mill WTW on the River Itchen. This triggered the need for the reservoir for PW to supply its own customers to offset the loss of the Itchen water.
November 2017	PW reservoir Stakeholder Group meetings resume	SG meetings recommenced after SW requested a bulk supply of 21Ml/d from the PW Gaters Mill WTW on the River Itchen, triggering the need for the reservoir. SG advised that the new bulk supply to SW would essentially take the full licensed amount from the River Itchen source; Havant Thicket Reservoir would 'plug this gap' within Portsmouth Water's supply area. Stakeholder Group now included SDNP.
March to May 2018	WRMP19 Public Consultation including the proposal for a reservoir fed by the Havant & Bedhampton Springs	In general the statutory consultees supported the PW draft Water Resource Management Plan (WRMP19). The plan included the spring fed HTR. There was 87% support for the proposed reservoir (11% answered don't know) <i>Note: Around the same time SW will have consulted on their draft WRMP19, their plan did <u>not</u> have effluent recycling via HTR as an option under consideration. Publicity about that consultation very unlikely to have reached those in Havant/ PW supply area.</i>
July 2018	PW Stakeholder Group meeting	SG updated on programme for delivery of the reservoir by 2029. Liaison with LPA's (HBC & EHDC) had been ongoing. Proposed to submit a hybrid planning application with some parts in detail (access road), others in outline (wetland). PW reported that there had been agreement with the LPA that there would be a 5 year period to address reserved matters after a hybrid application was approved.
2019	Ancala purchased PW	7/3/19 Bob Taylor confirmed to SG that Ancala were the news owners, advising they are mainly funded through large UK based pension funds who look for a stable return on their investments.
Late 2018/ early 2019	Principle Designer Contract awarded to Atkins	Atkins appointed by PW to complete the outline design and prepare the supporting documents to submit with the planning application including; Environmental Impact Assessment, Water Quality Modelling, Transport Assessment, Landscape & Visual Impact Assessment. Plan was still for a spring fed reservoir.

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7 March 2019	PW Stakeholder Group meeting	Meeting included a facilitated workshop on likely visitor numbers to the reservoir and the size of the car park needed, based on research presented by Planning Solutions for 3 visitor facility scenarios (Low, medium & high). There were also discussions on water-based activities. Atkins Project Director gave his first presentation to SG, slides referred to H&S being a top priority, considering the safety of the public and users of the site. He showed a slide of the embankment with the inlet/outlet shaft within the embankment (no offshore tower shown)
4 Feb 2020	Stakeholder Workshop	Workshop brought together representatives from a broad range of organisations, including local councils; Forestry England, walking and cycling groups; wildlife groups; community organisations and schools, to discuss and feedback on key issues related to the Havant Thicket Reservoir project. Topics discussed included; Parking and site circulation (such as footpaths, cycle-paths and bridleways), visitor centre and facilities & vehicle access route options.
September 2020	SW Gate 1 Reports	SW Gate 1 reports still referring to the base case as desalination & considering 5 effluent recycling options. Summary document (pg11) refers to a 'new potential solution' but what it was is redacted in all the Gate 1 documents. It is highly likely that this was effluent recycling via HTR. SW indicated they proposed to include it as a potential additional solution. Said to be potentially available by 2029, but confirmed it was not an option considered in WRMP19. Option B5 Peel Common & Budds Farm effluent recycling was to a bespoke env buffer lake at Otterbourne, (i.e. not using Havant Thicket Reservoir)
2 Nov 2020	PW submitted hybrid planning application for a spring fed raw water reservoir, with a second application for the associated pipeline from Bedhampton	Total storage capacity of reservoir to be 8,700 million litres. Hybrid application with outline details for; control house partially included within landscape earth mounding adjacent to SW embankment, visitor centre/ café, visitor car park (193 spaces & 70-75 overflow spaces), creation of a permanent wetland, bird watching hide/screen(s), perimeter tracks & a network of bridleway, cycle & footpaths.
8 Feb 2021 to 16 April 2021	SW Water for Life Hampshire Public Consultation 8/2/21 – 16/4/21	SW state the purpose and intent of our consultation exercise is to consult on our Base Case as presented in the WRMP19. The base case was desalination at Fawley which was still selected, with 8 alternatives mentioned as 'back ups' still being explored including effluent recycling via HTR. Pg 14 confirmed that WRMP19 selected back up option of Budds Farm effluent recycling option with recycled water discharged to augment the River Itchen having

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		been rejected. The consultation was not publicised by SW in the area of HTR or PW supply area. There was no mention in the consultation that PW customers could be impacted and receive the recycled effluent.
March 2021	PUSH meeting with briefing by SW on public consultation	Meeting of the Partnership for South Hampshire (PUSH) Planning Officers Group where SW gave details of their consultation on the Water for Life project in Hampshire. In response to a Freedom of Information request HBC confirmed this was the first time the Council knew of a potential option which involved effluent recycling via HTR which SW called the Hampshire Water Transfer and Water Recycling Project (HWTWRP).
5 May 2021	Guardian article on objections to desalination identified effluent recycling via HTR as an alternative backup to desalination <i>First time local people became aware of a proposal involving the reservoir at Havant</i>	Guardian article indicated; Southern Water said it was seeking the views of customers and stakeholders on its plans at what was a pivotal moment for “reshaping how we source, treat and supply water in Hampshire”. The company said it was also exploring the feasibility of recycling water and transferring it from a new reservoir at Havant Thicket, near Portsmouth, a scheme that it said had recently emerged as a potential backup to desalination. A link to this article was put on the ‘Stop the Chop’ site. Local people raised concerns with HBC Planning Department and local councillors. By then it was too late to respond to the SW consultation which had closed.
10 May 2021	Email to HBC Planners (Lewis Oliver) expressing concern about effluent recycling via HTR From Retired PW HTR Project Manager , Env & Biodiversity Specialists (TV)	TV emailed LO to draw attention to the effluent recycling via HTR backup option. Sharing the link to the Guardian article and to the SW consultation. TV suggested that if the LPA propose to approve the current reservoir planning application then the description of the development should be clarified to refer to ‘storage of raw spring water’. This was to give confidence that if effluent re-use was proposed at Havant Thicket Reservoir in the future a new separate planning application and impact assessment would definitely be required.
11 May 2021	HBC Planning Case Officer (LO) response	HBC (LO) replied; “the application has been submitted with an Environmental Statement, Habitat Regulation Assessment (HRA) and Water Framework Directive (WFD) which is based on raw spring water. As such using Effluent recycling for the reservoir would <u>not</u> be able to be undertaken with this permission. The Local Planning Authority would seek to control through appropriate conditions, to ensure that the development is undertaken in accordance with the current details, on which the application has been assessed. 14/5/21 TV sent LO a follow up email with questions regarding the proposed planning conditions and whether they were adequate, with some additional questions on the reservoir scheme.

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		14/5/21 LO phoned TV to respond and stated; On the issue of planning conditions the LPA are confident that any proposal for effluent recycling at the reservoir would require a new planning application. They had discussed this with PW and their representatives who are clear on this.
19 May 2021 9 June 2021	HBC Planning Committee EHDC Planning Committee To determine the spring fed reservoir and pipeline planning applications	Special planning committees to consider the PW spring fed reservoir planning application. Concerns expressed about SW proposal for effluent recycling. Planning Case Officer advised councillors no need to consider effluent recycling via the reservoir, as it does not form part of the current planning application. If the effluent recycling scheme were to progress it would require a new Environment Impact Assessment, as the impacts would be different, and a new planning application. Thus councillors would have the opportunity to determine that application separately at a later date. <i>Note: Sadly this proved to be incorrect and instead SW are applying to the SoS for planning permission.</i>
September 2021	<i>Date derived from later SW reports (see below)</i>	SW confirmation of the decision that the desalination Fawley option was rejected as not consentable SW confirmation of the decision that the back up option to desalination of Budds Farm effluent recycling option with recycled water discharged to augment the River Itchen was not deliverable. Note: SW Dec 2021 annual report on WRMP progress pg. 56 stated “in its decision Jan 2021 Ofwat had directed SW to remove the water recycling option discharging to the River Itchen.” <i>Note: As both of the SW selected and backup WRMP19 options were rejected at this time it represents a ‘material change’ to the SW plan. At this point there should have been a review of all the options and new public consultation. This is a statutory requirements when there is a material change and it did not happen (see Appendix A)</i>
15 October 2021	Planning permission granted for Havant Thicket Reservoir (spring fed raw water reservoir) & associated pipeline from Bedhampton Springs	Planning permission granted by HBC & EHDC with a long list of planning conditions and a S106 agreement signed on the same date. Most of the reservoir was granted in outline and would be subject to reserved matters applications. Description of what was approved made it clear that it was a reservoir for raw water storage. S106 agreement with LPAs, PW, HCC, FE covered mitigation/ compensation, site management plan, financial contributions, highway works etc.
December 2021	SW WRMP19 Annual Review 2020 - 2021	Table on page 50 lists recycling options including B4 Budds Farm via HTR (named HTR) Page 53 confirmed planning permission granted for HTR & refers to having identified an option for recycled water to fill HTR and provide a resilience benefit. Page 53 referred to SW being sufficiently confident the Bournemouth Water transfer cannot proceed. Page 57 sets out legal requirement to reconsult on WRMP19 if there is material change proposed. Page 58 sets out SW justification for not re-consulting when their selected options failed, which is extremely flimsy and not robust!

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		<p>Page 60 confirms desalination Fawley option was rejected in September 2021 as not consentable.</p> <p>Page 60 states in Gate 2 submission Dec 2021 SW confirmed the selection of B4 (Budds Farm via HTR), with B5 (Budds Farm & Peel Common) as a back up option.</p>
December 2021	<p>SW Gate 2 submission documents</p> <p><i>See additional information about risks of appeal/ public enquiry & questions in Appendix A.</i></p>	<p>Information published on SW website is heavily redacted & spread across several documents. Figures & tables relating to Option B4 blacked out. Information was certainly <u>not</u> in a form that was accessible to the public. Abbreviations were listed in a separate document 17 pages long!</p> <p>Gate 2 submission confirmed that the SW selected options was B4 (i.e. effluent recycling via HTR)</p> <p>Feasibility report & concept design confirmed the capacity of the Water Recycling Plant (WRP) was to be 15 MI/d. with a continuous sweetening flow of 5 MI/d required.</p>
25 Feb 2022	Retired PW HTR Project Manager , Env & Biodiversity Specialists (TV) sent letter to PW & response	<p>TV sent a letter & supporting document to PW setting out all of her concerns and things that needed to be considered in relation to effluent recycling, including loss of reservoir benefits (nitrates & biodiversity). Recommending that they not proceed with the SW proposal. If they did it was important that they took control of the water quality modelling as it was too important to trust to SW.</p> <p>PW response dated 4/4/22 was disappointing but stated that; “PW will ensure all environmental and community commitments from the original planning application are honoured in the event these additional plans are taken forward.” A commitment they have made publicly several times since.</p>
26 Feb 2022	PW reservoir SG meeting	Stakeholders given a briefing on options being ‘explored’ for effluent recycling.
1 March to 12 Apr 2022	Ofwat consultation on funding for the project	<p>Ofwat consultation on their draft determination for funding further work to investigate the effluent recycling via HTR project.</p> <p>Ofwat indicated that they proposed to impose a 10% incentive <u>penalty</u> on this solution. Page 20 confirmed this was because;</p> <ul style="list-style-type: none"> - There had been insufficient stakeholder engagement, particularly with customers who will receive the recycled water. - Insufficient progress made in carrying out key environmental assessments (SEA,HRA,WFD). - Insufficient environmental monitoring data to understand the impacts & risks. - Insufficient consideration of the impacts of pipeline routes. - Insufficient evidence of the impacts of the WRP on chalk catchments. - Insufficient sampling to provide seasonally representative characterisation to inform Drinking Water Safety Plans.

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		Ofwat also stated they were very concerned about the number of inconsistencies and inaccuracies identified in the submission by SW, with further inconsistencies identified through the query process. The external technical assurance process identified <u>material issues</u> which did not appear to have been addressed.
25 March 2022 & 31 May 22	PW SG members requested that an effluent recycling sub-group is established	<p>Main Stakeholder Group & Env. Sub Group requested that a new Water Recycling Sub-Group be set up as soon as possible, so that concerns could be shared and discussion points can inform the environmental and other impact assessments. PW Project Director (RM) confirmed they will speak to SW about setting up the sub-group as soon as possible. TV noted to PW that it would be extremely helpful to have a sub-group meeting before the imminent public consultation ends. <u>Effluent Recycling Sub-Group was <u>not</u> established by SW or PW.</u></p> <p><i>25/7/23 PW SG advised that a sub-group will be set up and asked for anyone interested to let them know. Note: Later found out group would only be permitted to consider public communications (see 28/9/23).</i></p>
May 2022	Ofwat final determination	<p>Ofwat supported ongoing funding for the effluent recycling via HTR, but also agreed to continue to fund the Peel Common effluent recycling option. In their final determination they raised concerns; 2.3 key risks include; budgetary risks due to unexpectedly higher costs, public perception skewed against water recycling component leading to planning process delays, required consultation on selected option & updates to WRMP19, no approved reverse osmosis membranes available for water recycling plant, customers do not consider recycled water to be wholesome and acceptable.</p> <p>3.2.1 Ofwat agreed that the investigation into env impacts is not as mature as would have been expected for gate 2 and this is an important factor in our decision to impose a 10% penalty. This leaves a residual risk that the solution could have unforeseen env impacts not foreseen or mitigated.</p> <p>3.2.7 Ofwat expect the companies to engage with the local community to clarify the impact of the changes from the original planning application for the HTR, such as the impact of including a water recycling component. Companies should make it clear if any previously identified environmental, community, or recreational benefits are affected by the introduction of the water recycling element.</p> <p>4. Ofwat are concerned that areas of the work are not yet at that standard, particularly in relation to identifying and mitigating environmental and drinking water quality risks. This therefore means that showstoppers could yet be identified, bringing potential delays or issues with consenting & permitting.</p>
5 July 2022 to 16 Aug 2022	<p>First SW public consultation on effluent recycling via HTR</p> <p><i>WRP capacity still stated to be 15MI/d, but SW advised that</i></p>	<p>First public consultation specifically on effluent recycling via HTR scheme. Six-week consultation period (5 July – 16 August 2022)</p> <p>Not made clear in published figure showing the scheme, nor in the text, that PW customers would receive the recycled effluent via Farlington WTW. Consultation poorly advertised, SW/PW did not put up posters at the reservoir site. Local community very concerned and campaigned against the proposal.</p>

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	7.5Ml/d now to be treated & transferred to Otterbourne daily as a sweetening flow	570 consultation responses were received, subsequent SW report published Jan 2023 confirmed; <ul style="list-style-type: none"> - 48% of people did not support Water Recycling - 46% of people did not support the SW options appraisal process - 41% of people did not support the selection of the Broadmarsh landfill (Site 72) for the location of the proposed new Water Recycling Plant
Sept 2022	PW SG meeting – now called the Community Advisory Group PW working with SW on the effluent recycling proposal	PW reported that the programme was still for reservoir delivery in 2029. Ward & Burke appointed for reservoir pipeline design and build. Update on trial reservoir embankment in south-west corner of site - work started in late July. Advised that The Avenue path would be closed from 25th July 2022 and won't reopen to allow preparatory work in advance of felling commencing. Works to build the new road junction on the B2149 commenced, with full road closure commencing in October 2022. PW advised stakeholders - Working with Southern Water to ensure the already approved reservoir scheme and, should it progress, the Hampshire Water Transfer and Water Recycling Project (HWTWRP) can both be delivered safely and with minimal disruption. PW project manager said; <ul style="list-style-type: none"> - Not pre-empting consultation /approval process for HWTWRP - Aim is to avoid additional work on reservoir embankment after it's been built. SW presentation to SG on their plans including an update on the summer 2022 consultation.
15 Nov 2022 to 20 Feb 2023	SW Public Consultation on their draft WRMP24	Effluent recycling via HTR selected for delivery 2031. Not clear that the recycled water would go to PW customer taps as PW would be using water from the reservoir to meet any demand shortfalls once the 21Ml/day supply is diverted from Gaters Mill WTW (River Itchen) to SW customers in Southampton.
15 Nov 2022 to 20 Feb 2023	PW Public Consultation on their draft WRMP24	Very little information on effluent recycling via HTR. Shows as not selected until very late in the plan period (2049). No mention that as a result of SW selection and delivery in 2031 PW customers would also receive the recycled effluent. Misleading information about PW customers only receiving the 'blended' water in a drought.
15 Nov 2022 to 20 Feb 2023	WRSE Public Consultation of the draft Regional WRMP	Water Resources in South East (WRSE) consultation on the draft Regional Plan includes the proposal for effluent recycling via HTR to meet the demand deficit in Hampshire. The draft Regional Plan is based on the options selected and put forward by the water companies.
3 Jan 2023	Bob Taylor email to A. Buckley confirmed PW customers will 'routinely' receive recycled water	PW Chief Executive Officer confirmed; "If the water recycling project is approved the mixed water will be supplied to two outlets from the reservoir. One of these, used on a more 'routine basis', sends water to our Farlington water treatment works for further treatment and supply to PW customers. The other supply will in times of drought deliver a supply to SW's Otterbourne treatment works through a 45km pipeline for further treatment and blending with good quality water at that site and onward supply to SW customers in Hampshire." Note 1: PW later advised mixed water from the reservoir will be used in a drought or emergency (e.g. failure of treatment works). From 2040 they will need to use the reservoir water containing recycled effluent more routinely.

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		Note 2: SW customers will receive the recycled water everyday of the year , as there will be a sweetening flow into the reservoir and down the 45km pipeline to Otterbourne every day. This is now forecast to be 20MI/day which is 8 Olympic size swimming pools of mixed water every day of the year transferred to Otterbourne treatment works.
20 Jan 2023	Concerned community representatives visit SW Worthing HQ to view 'restricted' documents under SW supervision which support the draft WRMP24 SW restricted documents identify that there are many alternative options that they have parked until 2029	11/12/22 Representatives requested visit to view SW restricted supporting documents. SW responded to advise documents would not be available until January 2023 even though draft WRMP consultation had commenced 15/11/22 and the documents should have been available. 12/1/23 Contacted SW again in January. Told documents could not be made available at SW sites in Hampshire, would have to travel to Worthing to view. Requested an all-day visit to view documents on 20/1/23. Told could only have 2 hours to view 3 very large documents. Three people from community went to Worthing HQ on 20/1/23 and found the options appraisal confirmed there were many alternatives options parked by SW until 2029 , the effluent recycling via HTR scheme had the highest impact score but was still selected, and the HRA document section for the scheme was blank, just cross referencing to an old 2021 screening that had already been panned by NE & EA as inadequate in many respects.
24 Jan 2023	Community questions sent to SW following trial effluent recycling plant tours at Budds Farm	Community representatives pooled questions following tours to the Buds Farm trial effluent recycling plant and one person sent them to SW. The first responses did not start to be received until March 2023 (i.e. after the draft WRMP consultation was over), with dribs and drabs and partial answers after that. As at August 2023 not all questions were answered. Final responses were disappointing/ some evasive.
Feb 2023	Community petition launched by Havant FoE & Climate Alliance	Petition asked Defra to delay SW plans for effluent recycling via HTR and demand they properly explore other cheaper, greener solutions first, giving a list of concerns. By 20/2/23 more than 3000 people had signed the petition. In just 4 weeks 4000 people had signed the petition, later rising to 5000.
15 Feb 2023	Public meeting hosted by HBC attended by SW & PW	Clear local people did <u>not</u> support effluent recycling via HTR and that they did not believe / trust SW. SW stated there were no alternatives, the only options were desalination & water recycling, which the local community research had already shown was not true. SW gave assurances at the meeting that the treatment processes would be carefully managed and that fail safes put in place would prevent pollution of the reservoir.
16 Feb 2023	Treatment failure at Otterbourne WTW – dirty water transferred to a clean water tank contaminating the drinking water supply	The next day there followed a serious treatment failure at SW Otterbourne WTW, resulting in contamination of the works and loss of supplies to customers for several days. There followed a second incident at Otterbourne and a third incident at Hardham very shortly afterwards. If the SW systems cannot protect direct discharges to the drinking water supply, what hope is there for HTR, where they expect to use the reservoir as an environmental buffer lake and their controls will inevitably less.

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14 June 2023	SW announce delay to publication of response to draft WRMP consultation	SW response to the draft WRMP consultation was due to be published on 14/06/23. Instead, they announced that it had become clear a few schemes would have to evolve further. These developments would impact on the initial proposed delivery time for the effluent recycling scheme via HTR and Littlehampton Recycling Project. Instead they intended to publish a Statement of Response by 31/8/23 and then launch a 12 week consultation in October 2023 to get feedback on the specific changes to the plan. The announcement indicated; SW had undertaken a Quantitative Schedule Risk Analysis which had found critical risks associated with the timeline for DCO consultation and consenting , DPC tender and commercial agreement, and integration with the HTR delivery by PW. Mitigation plans continued to be developed to secure the earliest delivery. SW are reviewing their water resourcing plans for Hampshire & Sussex more widely and are exploring various practical solutions in the short to medium term . This work will be displayed in the form of a mitigation plan to sit alongside our Statement of Response in August.
3 July 2023	PW announce delay to the delivery of the original reservoir, plus proposed pipeline tunnel will include effluent recycling pipework	Email sent to PW stakeholders confirming that the pipeline planning application would be delayed from July 2023 to early 2024 as they were now going to include the SW effluent recycling pipe in the tunnel design. They advised that; “This ‘one tunnel’ approach will mean that <u>the reservoir will be finished later than originally planned</u> . When planning and regulatory approvals are in place, Portsmouth Water will confirm the new date for the reservoir to be completed.” An email to the public was circulated confirming this on 26/7/23.
5 July 2023	HBC Overview & Scrutiny Committee attended by PW (SW did not attend)	PW response to questions from HBC O & S committee provided conflicting information. PW advised that 20 MI/d would now be treated & transferred to Otterbourne daily as a sweetening flow . The volume of 20 MI/d is equivalent to 8 Olympic size swimming pools of water per day. A massive increase on the information published with the Summer 2022 SW consultation which indicated 7.5 MI/d.
25 July 2023	PW reservoir SG meeting	SG advised a new effluent recycling group would be established soon anyone who was interested in being part of the group to let PW know (see entry 28/9/23). PW also advised that the engineering design had changed and that an offshore inlet/outlet tower and bridge would now be required . Said to be due to engineering concerns. Note: 1: Offshore tower/bridge originally designed out for spring fed reservoir scheme due to health & safety concerns (see entry above for September 2008). Note 2: More likely that the design change is part of future proofing due to the needs associated with the decision to incorporate the SW effluent recycling pipe and Otterbourne transfer pipe into the reservoir design. Note 3: Proposed that reservoir inlet pipe be diverted around SW edge of reservoir and across floor of reservoir to near the head of the former Avenue woodland. This is where the reservoir water will be very deep. Presumably this is to allow improved mixing of the water for when mixed recycled effluent is introduced.

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31 Aug 2023	SW response to the draft WRMP consultation published	SW Statement of Response published. Issues raised by consultees & the public with respect to effluent recycling via HTR hidden in a separate Annex 6, issues merged & response disappointing. Clear from Annex 8 on Aquifer Storage & Recovery options SW had not been fully reviewed these options in a meaningful way, referring to old studies.
28 Sept 2023	First water recycling sub-group meeting	Organised & hosted by P. Water, Southern Water did not attend. PW made it clear that the group was just to discuss communication issues and not wider concerns. Only comms people from PW attended.
4 Dec 2023	Confirmation that SW are making material changes to their draft WRMP & will have to review the draft plan & complete a new public consultation	Advised at community meeting with EA; Following regulator & public responses to Defra on the draft WRMP & delay to some selected schemes SW are making material changes to their plan (no longer proposing Fawley desalination & timeline for proposed selected options has changed), the Company now have to review the draft plan and complete a new public consultation on the revised draft WRMP.
31 May 2024	PW submit planning application for 2 pipelines in a tunnel	As part of future proofing the original reservoir plan to facilitate effluent recycling if approved in the future PW submitted a new planning application for 2 pipelines to the reservoir in a tunnel.
Summer 2024	SW Public Consultation on Hampshire Water Transfer and Water Recycling Project (<i>DCO Statutory Consultation</i>)	Consultation opened 29 May & closed on 23 July 2024. Scheme specific consultation in advance of a Development Consent Order application expected to be in 2025. SW indicate that volume of recycled effluent produced at the Water Recycling Plant & to be transferred to Otterbourne daily has increased to 30MI/d (was 7.5 then 20MI/d) . Overview drawings & text did not make it clear that PW customers will receive the recycled water. Consultation not widely advertised, posters eventually put up at reservoir site, but just A4 with complex text and not replaced when they blew away.
28 Aug 2024 (end date)	Ofwat draft determination on SW investment plan consultation	Consulting on biggest ever investment package proposed in the SW Business Plan which includes delivery of effluent recycling via HTR, including Ofwat proposed modifications. Information indicated Ofwat intend to publish their final decision on 19 December 2024.
11 Sept 2024	SW Public Consultation on revised draft WRMP	Deadline for responses to Defra 4/12/24. Disappointingly the SW review has focused on filling the gap between 2030 & 2035 when effluent recycling scheme forecast to be available , not completing a full review of all options, including more sustainable options.

The timeline shows that there was not open and honest information shared with the public or stakeholders about SW plans for effluent recycling via HTR before the May 2021 HBC planning committee meeting. Other points worth noting;

- SW customers & the Fawley community had years to engage and feedback on SW proposal for desalination at Fawley, in response to both the 2014 & 2019 WRMP, but the Havant community had no opportunity to comment on selection of effluent recycling via HTR before SW selected that as their preferred option in 2021.
- The documents that were published in 2020/21 on the SW website were heavily redacted to hide any references to Havant Thicket Reservoir.
- It was not clear even in the SW Summer 2022 consultation that water from the effluent recycling scheme would be received at the taps of PW customers.
- Even when stakeholders requested in March 2022 that a group be set up to discuss the effluent recycling plans this was not actioned by SW (or PW).

Timeline for reservoir & effluent recycling proposals

(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

- When SW were aware in September 2021 there was a 'material change' to their plan because Fawley desalination and Budds Farm effluent recycling discharged to the River Itchen were both rejected as not consentable, they should have reviewed all of the water resource options again and reconsulted on their draft WRMP. This was a legal requirement which SW have not complied with. See Appendix A for more information on the legal requirements, guidance and SW's own concerns on the risk of an appeal or public enquiry.

Timeline for reservoir & effluent recycling proposals
(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

Appendix A:

Legislation: Water Industry Act 1991 – Sections setting out the legal requirements relating to Water Resource Management Plans & Consultation Required

Section 37A Water resources management plans: preparation and review

- (1) It shall be the duty of each water undertaker to prepare **[F2]** publish and maintain a water resources management plan.
- (2) A water resources management plan is a plan for how the water undertaker will manage and develop water resources so as to be able, and continue to be able, to meet its obligations under this Part.
- (3) A water resources management plan shall address in particular—
- (a) the water undertaker's estimate of the quantities of water required to meet those obligations;
 - (b) the measures which the water undertaker intends to take or continue for the purpose set out in subsection (2) above (also taking into account for that purpose the introduction of water into the undertaker's supply system by or on behalf of **[F3]** water supply licensees);
 - (c) the likely sequence and timing for implementing those measures; and
 - (d) such other matters as the Secretary of State may specify in directions

The water undertaker shall prepare **[F6]** and publish a revised plan in each of the following cases—

- (a) following conclusion of its annual review, **if the review indicated a material change of circumstances;**
 - (b) if directed to do so by the Secretary of State;
 - (c) in any event, not later than the end of the period of five years beginning with the date when the plan (or revised plan) was last published,
- and shall follow the procedure in section 37B below (whether or not the revised plan prepared by the undertaker includes any proposed alterations to the previous plan).

Timeline for reservoir & effluent recycling proposals

(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

Note 1: A 'material change' is set out in the Water Resources Planning Guidelines, Section 3.0, relating to 'Review and maintain your final plan' (see page 14)

Water Industry Act 1991 - Section 37B

(3)A water undertaker shall—

(a)(subject to subsection (10) below) publish the draft water resources management plan in the prescribed way or, if no way is prescribed, **in a way calculated to bring it to the attention of persons likely to be affected by it;**

(b)publish with it a statement—

(i)whether any information has been excluded from the published draft plan by virtue of subsection (10) below and, if it has, the general nature of that information; and

(ii)that any person may make representations in writing about the plan to the Secretary of State before the end of a period specified in the statement; and

(c)send a copy of the published draft plan and accompanying statement to such persons (if any) as may be prescribed.

(8)The water undertaker shall—

(a)(subject to subsection (10) below) publish the water resources management plan in the prescribed way or, if no way is prescribed, **in a way calculated to bring it to the attention of persons likely to be affected by** it; and

(b)publish with it a statement whether any information has been excluded from the published plan by virtue of subsection (10) below and, if it has, the general nature of that information.

Note: It is clear that Portsmouth Water customers will be affected by the effluent recycling scheme via Havant Thicket Reservoir, as they will receive mixed water from the reservoir. Therefore, any Southern Water consultation which took place should have been publicised in a way that brought it to the attention of Portsmouth Water customers. **This did not happen.** In fact, SW actively redacted references to Havant Thicket Reservoir from documents published on their website in 2020 and 2021. Even in Summer 2022 when there was a specific consultation on that option the overview figure and text made no reference to the recycled water being received by Portsmouth Water customers. **Southern Water cannot claim that they have complied with the above requirement to publish details of their plan in a way calculated to bring it to the attention of persons likely to be affected by it.**

Timeline for reservoir & effluent recycling proposals

(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

Definition of a 'material change' of circumstance

The screenshot shows a web browser window with the URL www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline. The page title is 'Water resources planning guideline'. The left sidebar contains a 'Contents' menu with links to Sections 1 through 10. Section 3.9, 'Review and maintain your final plan', is highlighted. The main content area for Section 3.9 includes a paragraph stating that the plan must be treated as a live document and reviewed annually. It defines a 'material change of circumstance' as a change that requires a revised draft plan. A list of examples of material changes is provided, including significant changes in service level, measures, costs, or adverse effects on the environment. A 'Print this page' button is visible at the bottom left of the content area.

Contents

- Section 1 – Planning for a secure, sustainable supply of water
- Section 2 – National, regional and local planning
- Section 3 – How to form and maintain a WRMP
- Section 4 – Basis of planning
- Section 5 – Developing your supply forecast
- Section 6 – Developing your demand forecast
- Section 7 – Allowing for uncertainty
- Section 8 – Identifying possible options
- Section 9 – Aspects to consider in compiling a best value plan
- Section 10 – How to compile your best value plan

3.9 Review and maintain your final plan

You must maintain your plan. You should treat it as a live document. You should implement your plan, monitor its progress, and take action if required. Your final plan should show how the interventions within it will be translated into delivery plans and monitored during the relevant asset management period. You must review your published plan every year and report to the Secretary of State or the Welsh Ministers. This should be on or before the anniversary of publication of the final WRMP. You should follow the latest Annual Review guidance.

If through the annual review you demonstrate or indicate a 'material change of circumstance' (as described in the Water Industry Act 1991 Section 37A (6)) you must prepare a revised draft. A new revised plan must follow the procedures for preparing and publishing a plan as set out in the Water Industry Act 1991 Section 37B 'Water resources management plans: publication and representations'.

The definition of a material change of circumstances is not given as it relates to the final plan. The following lists possible examples, but you should not consider them definitive:

- a significant change in level of service from what was in the published plan
- new or significant changes to the measures that were identified in the published plan and are likely to have significant public or environmental interest
- a significant change in costs
- a change that could cause significant adverse effects on the environment

As a first step you should consult with the Environment Agency and, or Natural Resources Wales on any substantial changes that you wish to make to your plan. You will need to inform Defra or the Welsh Government if there is a material change of circumstances, within 6 months.

The Environment Agency and, or Natural Resources Wales will provide technical advice to the relative governments.

[Print this page](#)

If annual review shows a 'material change' you must prepare a revised draft plan. Southern Water identified a change but did not prepare a revised plan.

Definition of a 'material change'. Text below in blue confirms why the change is material.

Source: Extract of Water Resources Planning Guidelines, Section 3.0, 'Review and maintain your final plan'

It is clear that there was a 'material change' to the Southern Water WRMP for the following reasons.

- In September 2021 the WRMP19 selected Fawley desalination option and backup Budds Farm effluent recycling option with discharge to the River Itchen were both rejected as not consentable.
- A completely new option was selected by Southern Water to discharge recycled effluent from Budds Farm to the Havant Thicket Reservoir to mix with spring water and then pump it 45km to the Otterbourne WTW. This option was not previously considered in WRMP19 & therefore had not been consulted upon.
- Environmental Interest: This change meant that new environmental impacts needed to be modelled and assessed at both the new reservoir and Langstone Harbour SAC, SPA, Ramsar & SSSI. Neither of which would have been impacted by the previously selected options. The environmental impacts would be of significant public concern and interest. A new SEA, HRA and WFD were required.

Timeline for reservoir & effluent recycling proposals

(PW – Portsmouth Water, SW – Southern Water, HTR – Havant Thicket Reservoir)

- [Public Interest: Different customers would be impacted](#) by the new option selected, as Portsmouth Water customers would also be affected, as they would also receive the recycled water mixed with spring water from the reservoir. In fact, they are likely to ‘routinely’ receive the water, as confirmed by the PW CEO in January 2023. They had [not](#) been consulted when effluent recycling via Havant Thicket Reservoir was selected by Southern Water in late 2021.

Extracts of interest from SW Gate 2 technical reports (published on their website December 2021);

*SW confirmed; The need case for an alternative solution is **not beyond challenge** because it does **not** explicitly feature in WRMP19 as being a preferred solution to meeting the agreed supply deficit (SW Annex 3, Page 226)*

*SW confirm in various places in the documents; This Option is not part of the long-term scheme for alternative water resources set out in WRMP19. If this Option were selected **SW would expect to undertake an update of WRMP19 on the basis of there being a ‘material change in circumstances’**, so as to include this Option in an updated WRMP19 (Annex 5, page 268).*

The SW Annex 3 report confirms there is a **risk of a public enquiry associated with their current strategy**.

“Owing to the **Selected Option at Gate 2 being shift away from the ‘Base Case’ included within WRMP19** (desalination at Fawley), in order to support our future planning application, this **needs to be reflected in an update of WRMP19 and consultation on our Selected Option is also required**. It has been agreed with Defra and the EA that WRMP19 will be updated to reflect our Selected Option through the annual review process, and consultation on the Selected Option will take place via WRMP24. However, Defra has informed SW that it will issue a direction shortly (Dec ‘21/Jan ‘22) that will require SW to produce its WRMP24 submission to an expedited timeline (June ‘22, as compared with standard submission of August ‘22). Owing to this expedited WRMP24 timeline, **there is a risk that the quality of the information provided in WRMP24 will be unsatisfactory, leading to the potential for public inquiry into our plan**, and delay to scheduling and delivery of our scheme (Annex 3, Page 251).

There must be a significant risk to the reservoir programme of a public enquiry, or appeal process, due to the inadequate consultation with the local community and lack of opportunity to comment on the options appraisal process at the formative stage, due to the very late inclusion of B4 (Effluent recycling via Havant Thicket Reservoir) as the preferred option, an option that was not included in WRMP19. The presence of SW at reservoir stakeholder meetings updating them on their plan is not genuine consultation.

You have to ask the question, **if this is such a great option, why was it not selected before by the SW WRMP19 option appraisal process?**

Nothing has changed except that HTR now has planning permission. It was known when WRMP19 was published that PW was applying for planning consent for HTR. What is the ‘material change in circumstances’ which justifies this?

There is a significant concern that local people have not had the same opportunity to comment as other communities impacted by SW options appraisal process, as option B4 was not selected until the end of Gate 2, with development progressing now to Gate 3. The community to be impacted by the desalination plant at Fawley have had years to make representations and raise concerns during public consultations on draft WRMP14 & 19, and SW have now withdrawn the Fawley desalination option. That opportunity has not been afforded to those in the vicinity of the Havant Thicket Reservoir and B4 infrastructure.