

Representatives of Havant Matters (havantmatters.org) met with Southern Water's CEO, Lawrence Gosden, on 10th April 2025 to discuss our revised draft Water Resources Management Plan 2024 (rdWRMP24). During the meeting Havant Matters provided written submissions on issues that are of key concern to them.

These are:

1. Growth and demand forecasts used for the rdWRMP24;
2. Alternative location(s) for Southern Water's abstraction on the River Itchen;
3. The site used for locating the water recycling plant as part of the Hampshire Water Transfer and Water Recycling Project (HWTWRP);
4. Leakage reduction; and
5. Operational practices.

We welcome Havant Matters' continued engagement on the HWTWRP as we prepare our application for a development consent order (DCO). This document responds to the key themes raised in relation to point 3, the proposed site for locating the water recycling plant as part of the HWTWRP project. Havant Matters' feedback on the proposed site can be summarised according to two key themes, which we have responded to below:

1. Concern over the use of a former landfill site, the potential for environmental impacts on environmental receptors associated with constructing HWTWRP on the site, and the ability to adequately mitigate potential impacts; and
2. The adequacy of the site selection process to identify the site as the preferred location for the water recycling plant, including whether a reasonable number of alternatives were considered under the methodology and the reasons for not progressing those alternative options.

Concern over the use of a former landfill site, the potential for environmental impacts on environmental receptors associated with constructing HWTWRP on the site, and the ability to adequately mitigate potential impacts

Southern Water has considered Havant Matters' feedback and the concerns raised. As part of preparing the DCO application for the HWTWRP project, we are in the process of undertaking detailed environmental assessments in accordance with all relevant legislation and guidance. This includes a comprehensive Environmental Impact Assessment (EIA) that is being undertaken in accordance with the agreed scope set out in the Secretary of State's Scoping Opinion (dated 31 August 2023), a Habitats Regulation Assessment (HRA) and a Water Framework Directive Assessment (WFDA). We are engaging with our regulators and statutory nature conservation bodies as part of undertaking these assessments, and are taking into account their feedback as the assessments progress.

Through these comprehensive and iterative assessment processes, we are able to identify potential pathways that have the potential to cause impacts and to assess what those impacts may be and where they may have a likely significant effect on sensitive receptors that form part of the surrounding environment.

A key component of the EIA process is the gathering of data through surveys and investigations to inform the 'baseline' environmental conditions in the project area. This means that the points raised about the current status of the site, including the condition of the former landfill and the potential presence of certain chemicals and materials, are being fully investigated and taken into account. The assessment of likely significant effects involves assessing the impact of change from the construction and operation of HWTWRP and understanding what those effects may be on sensitive receptors in the project area, taking into account the baseline information. Accordingly, the concerns raised in relation to the proximity of chalk aquifers and other environmental designations are being taken into account as part of the assessment and identification of mitigation measures.

As our assessments are still ongoing, the outcomes of the EIA will be reported in the Environmental Statement that will be part of the DCO application. However, as part of undertaking the EIA, we published a



Preliminary Environmental Information Report (PEIR) at our Summer 2024 Consultation. This included preliminary information on the assessments being undertaken, the potential for likely significant effects arising from the project, and our approach to mitigation. The purpose of the PEIR was to provide consultees, such as Havant Matters, with an opportunity to understand this preliminary environmental information as part of responding to our statutory consultation, so that we can consider this feedback as we continue to develop our proposals ahead of submitting our DCO application.

As part of the EIA process, we are identifying measures to mitigate likely significant effects. This follows the mitigation hierarchy to avoid, reduce and then mitigate impacts and any mitigation that we rely on will be a secured commitment that must be complied with in accordance with the DCO. Our proposed mitigation is informed by the technical studies and outcomes of the EIA and mitigation measures will be included in a suite of management plans and other control documents, including the outline Construction Environmental Management Plan and outline Operational Management Plan. We provided information on our approach to mitigation as part of our Summer 2024 Consultation, and you will be able to review the documents in full when the DCO application is published.

In response to the specific concerns raised about the adequacy of the mitigation to deal with potential risks at the proposed WRP site, we are carefully considering construction methods that will avoid and minimise impacts to mitigate against the risk of additional pathways being introduced through the development of the site. This is set out in the PEIR.

The following groups of measures, as outlined in the preliminary Outline CEMP, are of particular importance to land quality and ground conditions:

- Measures to mitigate risks to human health during construction from potential exposure to contaminated materials.
- Measures to protect and mitigate risks to controlled waters.
- Measures to manage the re-use of excavated soils.
- Measures relating to waste management, and management of wastewater.

In addition to the above, a range of tertiary mitigation measures will be adopted to manage the effects on land quality and ground conditions receptors during the operation of the HWTWRP. This includes the development of task specific risk assessments and method statements to manage any required excavation works, as well as the development of an Emergency Response Plan (or similar) to mitigate the potential impacts from an uncontrolled release of hazardous materials.

Havant Matters has raised concerns about the use of Site 72 for the WRP and the potential impacts, but as set out above, these are all being fully considered, assessed and will be mitigated (where relevant) as part of the comprehensive DCO process. Information has been shared at our various consultation events as we have developed our proposals, and the Environmental Statement will be available to review when the DCO application is published. This will be in advance of the DCO Examination starting, which is a public process during which the DCO application, including the relevant environmental information, will be fully examined by the Examining Authority. Importantly, the process provides interested parties, such as Havant Matters' members, with the opportunity to actively participate in the Examination, and there are multiple opportunities to submit representations, both in writing and at hearings. We welcome your participation in this process, as it is important that all views are considered by the Examining Authority prior to making its recommendation to the Secretary of State on whether to grant consent for the HWTWRP project. The ultimate decision on whether to grant consent is made by the Secretary of State who will consider, amongst other things, the outcomes of the EIA, HRA and WFDA in reaching their decision in accordance with the relevant legislative and policy framework.

Adequacy of the site selection process to identify the site as the preferred location, including whether a reasonable number of alternatives were considered under the methodology and the reasons for not progressing those alternative options.

The outcomes of the site selection for the Water Recycling Plant were initially presented at the Summer 2022 Consultation, and a further review of the site selection was presented at the Summer 2024 Consultation.

The site selection was based on identifying a site as near to Budds Farm WTW as possible that minimised pipeline lengths and the distance that treated wastewater would need to be transferred, with associated energy requirements, costs, and embedded carbon.

Site identification was based on the application of 500m search bands from Budds Farm WTW. As this is a generally built up area and there are environmental and other designations, it was extended to 1.5km to ensure that a reasonable number of potentially suitable sites could be identified for consideration. There is no legislation, policy or guidance that sets parameters for the search area, it is up to the applicant to define its own methodology and search area based on meeting the project objectives and required delivery outcomes, as well as the specific circumstances of the project. The approach followed is a well-established approach, starting at the point of connection, which takes a proportionate approach to identifying a robust search area for the consideration of alternatives.

Within this 1.5km boundary a total of 24 sites were initially considered, see Figure 1. These sites were reviewed against a wide range of environmental, planning, engineering, and construction criteria, informed by legislative, regulatory and policy requirements, to identify the preferred location for the WRP taking into account this range of considerations.

This included reviewing the presence of historic landfill sites and known potential sources of contamination. The site selection process identified that site 72 was a former landfill and this was considered as part of the assessment of the options against the consenting evaluation criteria, to identify potential consenting risks. The outcome of this process was that site 72 generally performed well against the criteria and that the potential risks associated with it being a former landfill were considered to be capable of being mitigated to an acceptable level. The impacts will be fully considered as part of the EIA and other environmental assessments. There is no restriction in the legislative and policy framework on the use of former landfill sites and the National Policy Statement for Water Resources Infrastructure and National Planning Policy Framework starting principle is to make as much use as possible of previously developed or 'brownfield' land.



Figure 1: WRP Parcels Included in the Continual Review Process

In addition, Havant Borough Council has allocated site 72 as employment land in its local plan and the site has the benefit of an outline planning permission for industrial use, which further illustrates its suitability for development in accordance with the adopted development plan and land use framework. Importantly, the site is not on the contaminated land register. In response to the feedback that the proposed WRP is of a different nature and scale to the already consented industrial development, it is recognised that there are differences between the two development proposals, and this is reflected in the scope of the environmental assessments and the type of mitigation that is being considered for HWTWRP, as set out above.

A number of the sites considered were identified to have risks associated with historic landfill and ground contamination; as much of the area around Budds Farm Wastewater Treatment works is reclaimed land that has been filled with waste. When undertaking the site selection process, it was considered that mitigation measures could be implemented to reduce any adverse effects to an acceptable level, and that bespoke details would be developed depending on the site selected.

The outcomes of the initial site selection process presented at both the Summer 2022 and Summer 2024 Consultations resulted in the identification of WRP_72 (Site 72) as the preferred site against the criteria that were considered. The other sites considered were not preferred for the following reasons, which are supported by relevant national planning policy including the National Policy Statement for Water Resources Infrastructure:

- Risk of flooding
- Loss of public open space within Havant
- Landscape and visual impacts, including the Chichester Harbour National Landscape designation
- Proximity to residential development



- Physical constraints such as access restrictions or challenging topography
- Presence of existing business premises

The initial site selection only considered undeveloped land, however following engagement with Havant Borough Council, six new and amended sites were identified on existing employment developments, see Figure 2 below. These sites performed worse against the planning and engineering criteria, because development of the Water Recycling Plant on these sites would require additional tunnelling, therefore increase in costs, and the demolition of the existing employment development, which would displace businesses and jobs.

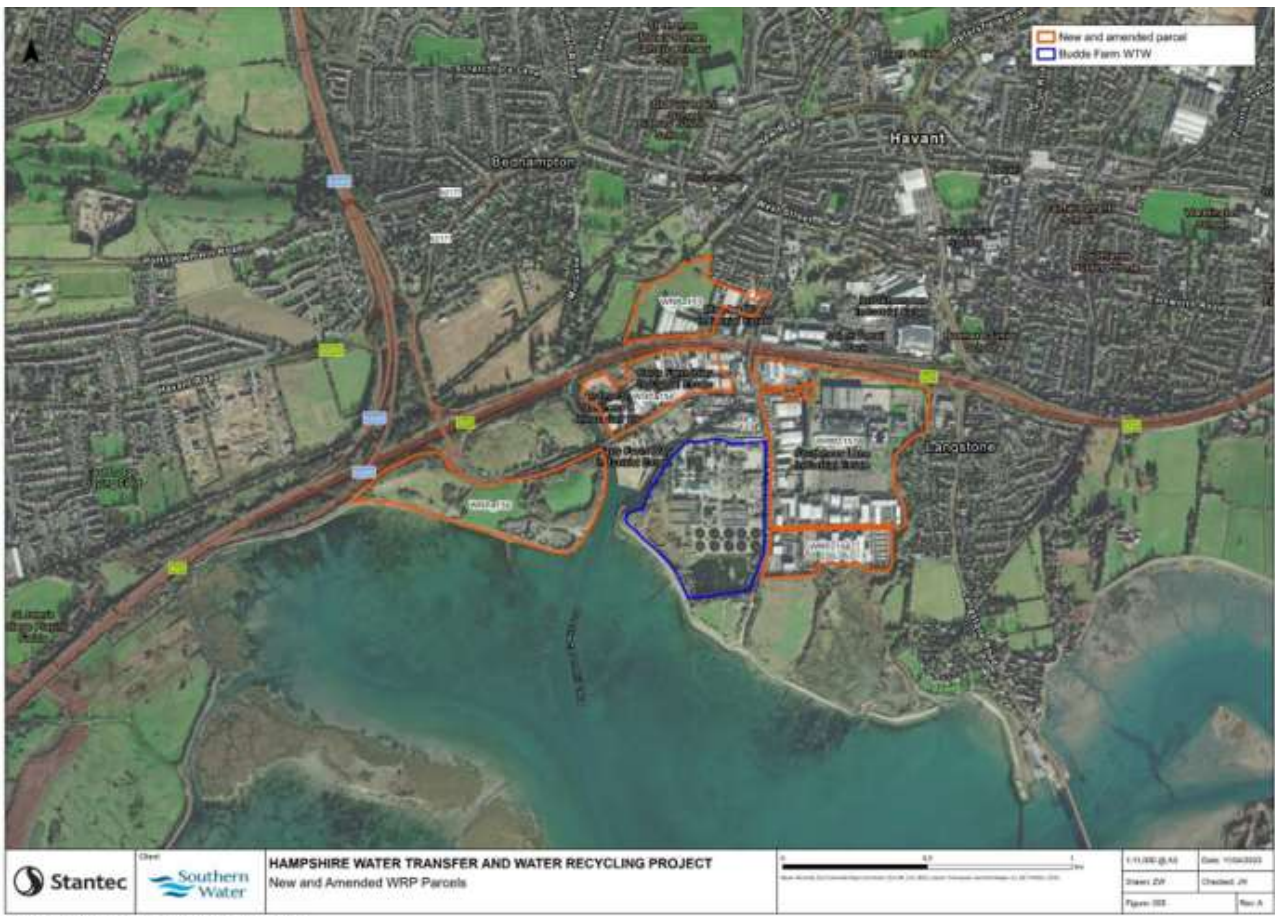


Figure 2: New and Amended WRP Parcels

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 relevant site, mitigation of environmental effects, and the pipeline connections to Havant Thicket Reservoir and Budds Farm Wastewater Treatment Works. Out of the sites that were considered to be suitable (which comprised WRP_72 (Site 72) and three other existing employment sites), Site 72 performed the best as it was undeveloped and required no removal of existing businesses and employment development.

Havant Matter's feedback raises concerns that the mitigation hierarchy of first avoiding, then reducing and mitigating impacts is not being followed in relation to the design of the HWTWRP project. A core component of the detailed site and scheme development process has been to consider alternative options, as part of

designing the project, with the aim of avoiding and minimising impacts in the first instance. This is evidenced through the extensive scheme development process, which was reported on in the 2024 Scheme Development Summary published at our Summer 2024 Consultation. The application of the mitigation hierarchy is also a key feature in the Preliminary Design Principles set out in Appendix 3.3 of the PEIR that was published at our Summer 2024 Consultation. These Preliminary Design Principles have guided all stages of the design of the HWTWRP project and further information on this process will be included in our DCO application.

An example of applying the mitigation hierarchy to the design of the HWTWRP is locating the WRP and associated infrastructure predominantly within the western “cell” of the site, where the existing ground levels and topography are already favourable, therefore reducing the need to “level” the site. By designing this part of the project in this way, it minimises the requirement for excavation, and the associated treatment of the waste, and provides health & safety and sustainability benefits through reduced off-site disposal, which minimises the potential for impacts.

Conclusion

A methodical and proportionate approach has been taken across the regulatory and planning development of the project. This is particularly the case with assessments of alternatives, as required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations), tailored according to the specific facts and circumstances of the proposals. Regard has also been given to the National Policy Statement for Water Resources Infrastructure and relevant case law, policy and guidance relating to consideration of alternatives and site selection. The site is not designated as contaminated land and therefore the contaminated land regime does not apply. In any event there is no separate requirement to consider alternatives under the contaminated land regime. In summary, a proportionate approach to the consideration of reasonable alternatives has been undertaken and SWS considers that it has identified a site that is in conformity with planning policy and, with good design and mitigation, will meet the requirements for the water recycling plant. Therefore, extending the search envelope beyond 1.5km is not required.