



SOLENT PROTECTION SOCIETY
Protecting the Solent and its environment for future generations

WATER FOR LIFE – HAMPSHIRE
WFLH@southernwater.co.uk

14 April 2021

Dear Sirs

The Solent Protection Society is a Charity, founded in 1956, whose mission is to ensure the ecological and environmental well-being and wise management of the Solent area, its natural beauty and amenities, so that these may continue to be enjoyed by present and future generations.

This letter is our response to your consultation brochure, 'Water for Life - Hampshire', documented in the following numbered points:

1. Your whole proposal assumes a shortfall in the supply of water but your consultation paper is extremely vague about the size of that shortfall, other than to say "Reductions to our abstractions mean we now have a shortfall of about 190 million litres of water per day during a 1-in-200-year drought event. How does this relate to the proposal to build a 75 MLPD desalination plant? Does it imply that the desalination plant would only be in operation once in 200 years, or that you really need a plant 2.5 times larger than you state?
2. It is difficult to make any detailed response to the proposal to build desalination plant at Fawley without more information on the particular site, the size of the plant, its impact on the local community, the noise impact during construction and while in use and, most importantly, the effect on the local environment and its wildlife. We are very sceptical of your statements on 'Environmental Net Gain', "Added value" or "Nutrient Neutrality".
3. It is noted from the response by New Forest National Park that no dialogue has been entered into with them. We also find no evidence of coordination with either Natural England or Fawley Waterside Ltd. The report suggests that considerable consultation has taken place with 'customers and stakeholders'. We would like to see evidence of that consultation and of the form it took.
4. In our opinion, the Environmental Impact Assessment should have been a priority in the consultation process and we consequently have considerable concern that sufficient weight will be given to the implications of the environmental impact.
5. The NPPF are proposing policies to ease the planning process with Permitted Development Rights and Local Development Orders (LDO). While this applies to Seaports, the approach could also be stretched to enable development to proceed without going through the Local Planning

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Authority. We are concerned that the Development Consent Order regime might not provide adequate opportunity for stakeholders to express their views. We would strongly recommend that the project is progressed through the Local Planning Authority under the Town and Country Planning Act and by applications to the MMO for marine licences. This would not only give time for local comment and ensure that the Environmental impact is closely scrutinised by our own, and other, experts. The NPPF talks of 'environmental tests' for sustainable development, but this needs to be carried out locally with local bias and not as national policy.

6. The shoreline of the Solent has internationally protected habitats, including wetland and vegetation with the backdrop of the New Forest National Park. We seek to retain the visual amenity of the shoreline, and to protect the wetland habitats. The Water for Life Consultation Report does not consider this visual and habitat shoreline appearance and how such an intrusive desalination plant would interrupt this amenity. Further, it does not explain exactly where the plant would be, the area of development or the height of the buildings. We believe that no amount of replanting and remodelling of the present wetlands and seabed will mitigate any development of this type.
7. Probably the greatest impact to marine life would arise from the discharge of warm brine. This can be damaging to marine life on and in the sea bed. The amount of brine produced is often 150% of the volume of freshwater produced. In addition, the discharge often includes other chemicals such as chlorine which are used to control bacteria etc. These are toxic to marine life. The brine discharge needs to be in open sea water which suggests a pipeline on the seabed, possibly beyond the Isle of Wight.
8. Wildlife in the sea is in danger of being sucked in to the intake pipes or caught on the screens on these pipes. Either way wildlife is very likely to be at considerable risk of destruction, however efficient filtration will be. The Solent is already deficient in the smallest fish and invertebrates, which inevitably will be affected.
9. Southampton Water has poor water quality and the desalination plant will concentrate these pollutants in the brine discharge making it more toxic.
10. We need more certainty of the effects of the water collection from the Solent, together with discharge proposals, with a report by an independent investigator - a respected technical/scientific expert. We consider that a comprehensive environmental assessment needs to be done and published to assist us and other bodies, both statutory and non-statutory, to understand the consequences of both the inlet and outfall of the plant.
11. We have concerns with regard to the construction of further pipelines to Testwood Water Supply Works. Your suggestions are noted, but the installation of these pipes will be equally disruptive. We trust that any additional pipework will not be within Southampton Water or its wetlands.
12. We question whether Desalination should be the preferred option, wherever it might be located. It would be expensive to build. It would consume a large amount of energy which would have to be produced by conventional power stations because in the foreseeable future there would be insufficient electricity available from 'green' sources. Also, there can be no guarantee that, when it was needed, the wind would blow or the sun would shine. At a time when our national priority should be to reduce global warming, the proposed desalination plant will be increasing the country's output of CO₂ instead of reducing it. How is this compatible

with the statement on page 7 of your brochure that you have committed to become carbon neutral by 2030?

13. There are clearly important outstanding considerations for the environment, and its marine habitats, that would make any Desalination plant unacceptable in the Solent region. We therefore object to the proposals in the Water for Life report that a Desalination plant is viable in the Solent.
14. We consider that the alternative schemes should be re-examined, starting with accelerating your plans to reduce leaks of water. You asked for our comments on the alternative schemes. We object to schemes A2 and D1 because they still involve desalination plants. There is insufficient information to establish whether the other schemes would have marine implications but we would like to examine them when more detail is available. Your alternative maps show considerable pipework, to link Otterborne with Havant, Budds Farm and Peel Common, part of which goes through the South Downs National Park, but this still remains preferable, in the long term, to any form of high energy and environmentally damaging desalination plants.
15. Finally, we would like to be kept informed of all developments and request that Solent Protection Society be registered as a Stakeholder.

We look forward to your provision of the further details requested in the body of this letter.

Yours faithfully

Robert Comlay
Chair
Solent Protection Society