

**Thames Water Response to Core Policy 14: Upper Thames Reservoir, Supporting Paragraphs 5.43-5.47 and Policies Map Safeguarding Area for Upper Thames Reservoir**

**Question 5 – Reason Why**

Thames Water wholly support the safeguarding of the reservoir site between the settlements of East Hanney and Steventon and that the Local Plan is sound in this respect. However, Thames Water consider that the detailed wording of the Policy requires amending as does the supporting text and map of the area to be safeguarded for the reservoir.

In accordance with Section 37B of the Water Industry Act 1991, the water companies must review and update their Water Resources Management Plan (WRMP) that sets out how they will maintain a balance between the demand for water in their supply area against the available water supplies, while ensuring the environment is protected, every 5 years. In July 2014 Thames Water received approval from the Secretary of State for Environment, Food and Rural Affairs to publish their Water Resources Management Plan covering the 25-year period from 2015 to 2040, called WRMP14, in accordance with Regulation 6 of the Water Resources Management Plan Regulations 2007.

Thames Water's approved WRMP14 identifies the need for a large water supply scheme to supply London from the mid 2020s onwards. The preferred scheme included in the plan is a 150 Ml/d wastewater reuse scheme. However, the robustness and resilience of this chosen option for water supply has not been confirmed and there remain a number of uncertainties associated with the scheme which require further work and resolution over the next five years. Given these uncertainties, the WRMP14 identifies three potential water supply options (wastewater reuse scheme, inter basin raw water transfer scheme, reservoir storage option within the Thames catchment) to be subject to detailed further studies over the next 5 years to determine what represents the 'best value' water supply option for TW to promote in its next draft WRMP in Spring 2018.

One of the reservoir storage options in Thames Water's WRMP14 is the Abingdon reservoir site on the area of land between Steventon, Drayton and East Hanney, to the south west of Abingdon. Whilst there are other potential sites for a reservoir in the Thames catchment, the Abingdon site is the only one that can accommodate a raw water storage reservoir development greater than 100Mm<sup>3</sup> (> 275 Ml/d). The site therefore remains the preferred option for the Upper Thames Reservoir based on detailed work already undertaken.

Thames Water therefore wholly agree that the Upper Thames Reservoir site should be safeguarded on the Policies Map and in Policy 14.

Regarding the Upper Thames Reservoir safeguarded area on the draft Policies Map, Policy 14 states that: *"Land is safeguarded for a reservoir **and ancillary works** between the settlements of East Hanney, Drayton and Steventon.."* [our emphasis]. Thames Water wholly support this statement. However, the safeguarded area for the reservoir as shown on the plan at Appendix F and on the Policies Map, has been amended to a more circular form which just follows the rough outline of the proposed reservoir itself and does not include all of the ancillary works.

Thames Water consider that it is essential that the safeguarded area includes the ancillary works including the areas of land required for the diversion of the Hanney to Steventon Road and the Wilts and Berks Canal, because it would not be possible to construct the reservoir if these areas are not also safeguarded from inappropriate development. The area to be safeguarded should be identifiable through the use of clear boundaries to mark and identify that area.

The Council had previously prepared a draft safeguarded area plan in November 2009 to accompany an earlier draft of the Local Plan (previously known as the Core Strategy) which did include the ancillary areas and Thames Water consider that this plan should be used for the safeguarded area on the adopted Policies Map and at Appendix F (please refer to attached Nov 2009 plan). An indicative layout plan for the Abingdon Reservoir from the original site selection is also attached for information.

In relation to the wording of Policy 14, Thames Water consider that this also requires amending.

The first paragraph of the Policy sets out that the reservoir site will be safeguarded: “..*Until or subject to that decision...*”. This is a reference to the examination of Thames Water’s Water Resources Management Plan 2019. This requires amending as the examination of the WRMP does not produce a decision on the final WRMP and confirmation whether or not the Reservoir should be included. After the Examination of the WRMP a report will be sent to the Secretary of State making recommendations, but the Secretary of State could potentially disagree with the recommendations in the report and a ‘decision’ will not be made until the Secretary of State approves the plan for publication. The wording should therefore be amended to make reference to the site being safeguarded until the WRMP19 has been approved for publication in accordance with Regulation 6 of the Water Resources Management Plan Regulations 2007 (refer to question 6 below for proposed change to wording).

Similarly Thames Water is concerned that it may not ever be possible to comply with the second paragraph of this policy which only allows a reservoir to be brought forward where a masterplanning process has been agreed between Thames Water and the community, the local authority and the local highway authority. It is unclear what constitutes the community with whom agreement must be obtained. Moreover if agreement cannot be obtained either with the community or local authority or local highway authority then the reservoir cannot be brought forward in accordance with the policy. Thames Water therefore considers that the policy should refer to consultation rather than agreement. Furthermore this part of the policy is concerned more with substance than process. Thames Water presumes that the point of this part of the policy is to ensure full engagement takes place on the fundamental documents that will inform the planning and development of the reservoir. Thames Water supports this. Thames Water therefore suggests that this part of the policy should be amended to refer to consultation on the Masterplan, Development Brief and Design Statement to enable full participation by stakeholders in the production of those documents.

Regarding the development control part of the policy Thames Water welcome this in principle given the current absence of a National Planning Policy Statement for Water. However, we have some comments on Part 1 and 2 of the policy.

Given that Policy 14 safeguards the land until the WRMP19 is approved and published, it is considered that Part 1 duplicates the WRMP process covered by the Water Industry Act 1991. The needs case for a reservoir will be established by the WRMP process and approval by the Secretary of State and it will not be necessary or appropriate to re-evaluate this needs case as part of the planning approval process. Part 1 should therefore be deleted.

Part 2 should similarly be amended to ensure that the proposal is in accordance with the Masterplan, Development Brief and Design Statement and that it satisfies certain criteria to ensure that it is consistent with the earlier part of the policy.

Thames Water have no comments on the criteria i to vii.

The detailed wording of the paragraphs 5.43-5.47 supporting Core Policy 14 require amending, so that they are consistent with the changes Thames Water are proposing to Core Policy 14.

## **Question 6 – Proposed Changes**

### **Policies Map & Appendix F**

The area safeguarded for the proposed reservoir in Appendix F and the adopted Policies Map should be amended to include the ancillary works and diversion routes as mentioned in Policy 14. Please refer to the attached Vale of White Horse Council plan dated November 2009 which should be used for the reservoir safeguarded area on the adopted Policies Map and Appendix F.

### **Core Policy 14: Upper Thames Reservoir**

Policy 14 should be amended as follows:

“Land is safeguarded for a reservoir and ancillary works between the settlements of East Hanney, Drayton and Steventon, until the examination of Thames Water’s Water Resources Management Plan 2019 **has been published following approval by the Secretary of State**. Until or subject to that **approval**, development that might prejudice the implementation of the Upper Thames Reservoir will be refused.

The safeguarded area for the proposed reservoir is shown on the Adopted Policies Map.

The proposed reservoir, if included **as a preferred option** in an adopted Water Resources Management Plan, must be brought forward through a Masterplan, **Development Brief, and Design Statement** ~~ning process agreed~~ **following consultation on those documents by Thames Water** **with** ~~between~~ the community, the local authority, the local highway authority and the statutory utility provider.

Any proposal for a reservoir must

~~1. be demonstrably the best option to meet a clearly identified need, having regard to reasonable alternative options as set out within an adopted Water Resources Management Plan, and~~

~~2. be~~ **in accordance with the Masterplan, Development Brief and Design Statement consulted upon and must:** ~~in accordance with a comprehensive planning and development brief, including a masterplan and design statement that:~~

- i. mitigates the impact of construction on local people, the environment and roads
- ii. minimises the effects on the landscape of an embankment reservoir through its design, general configuration and the use of hard and soft landscaping
- iii. maximises the creation of wildlife habitats and biodiversity
- iv. promotes the recreational uses of the reservoir consistent with the landscaping and biodiversity values of the proposal and having regard to the traffic impacts of such uses
- v. includes a new route for the diverted Hanney to Steventon road, to include provision for an off-road cycle path
- vi. makes provision for the new route of the Wilts and Berks Canal, and
- vii. includes measures to avoid and mitigate any other significant impacts identified through the environmental impact assessment of the proposal, including on the local and wider highway networks and on surface water and fluvial flooding.”

### **Supporting Text – Paragraphs 5.43-5.47**

The text supporting Core Policy 14 at paragraphs 5.43 to 5.47 should be amended to also refer to the Longworth Reservoir site as follows:

“The Upper Thames Reservoir

5.43. Thames Water has identified the possible need for a major new reservoir in the district between the villages of East Hanney, Steventon and Marcham **or to the north of the village of Longworth** to help the statutory utility provider manage water supply and ensure current and future needs can be met.

5.44. The Water Resources Management Plan (WRMP) 2014, published by Thames Water, identifies three potential options to address its long term water resource management in the south east, including the development of a large storage reservoir.

5.45. Thames Water has confirmed that the Upper Thames Reservoir (UTR), proposed to be located within the Vale **at Abingdon**, remains their preferred option if a large storage reservoir solution were to be selected. **If a smaller reservoir is selected as the preferred option the reservoir site at Longworth is an alternative option.** A decision is expected on the preferred long term water resource option by 2019, when Thames Water’s Water Resources Management Plan 2019 is expected to be approved for publication by the Secretary of State.

5.46. As the Vale's Local Plan 2031 Part 1 will be adopted ahead of the WRMP 2019, land will need to continue to be safeguarded until the future of the UTR is known in accordance with Core Policy 14 **and Core Policy ??**.

5.47. The **sites** will continue to be safeguarded until such time as **they are** ~~it is~~ no longer considered necessary, as set out in the approved WRMP 2019, or subsequent decisions made by Thames Water or the Secretary of State.

**5.48 The Upper Thames Reservoir proposal, if progressed, is likely to constitute a Nationally Significant Infrastructure Project under the Planning Act 2008 and therefore an application for development consent is likely to be submitted to the Planning Inspectorate for determination."**