

Planning

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Dear Sirs,

Thames Water draft Water Resources Management Plan 2019

Thank you for providing Vale of White Horse District Council with an opportunity to comment on Thames Water's proposals set out in the draft Water Resources Management Plan (WRMP) 2019 currently available for public consultation.

The Council acknowledges Thames Water's ongoing commitment to provide a secure and sustainable supply of water for their customers across the six Water Resource Zones (WRZ), including Swindon and Oxfordshire (SWOX). The Council recognises the need to continue to address and support adequate water provision, particularly in the South-East region which has been identified as an area of water stress. The Council also acknowledges Thames Water's commitment to address the identified shortfall in the London WRZ and Swindon and Oxfordshire WRZ through the proposals set out in the draft WRMP.

In particular, the draft WRMP has identified the need to deliver a proposed reservoir of 150 Mm³ (Million cubic metre) in the Swindon and Oxfordshire WRZ, located within this district, to provide 300 Ml/d (Million litres per day) to supply water to London and the wider South-East region.

The Council's response focuses on three key areas which relate to the legal process for preparing the draft WRMP, the assessment of alternative options in the draft WRMP, including the proposed reservoir at Abingdon, and the need for a public inquiry to be held to ensure that the implications of each water resource option set out in the draft Plan have been fully explored in detail. The Council may wish to provide a further response to more detailed and technical matters relating to the draft WRMP at a later stage.

Water Resources Planning Guideline and the preparation of the draft Water Resources Management Plan

The Council highlight the Water Resources Planning Guidelines published in May 2016 by the Environment Agency and Natural Resource Wales, in collaboration with Defra, the Welsh Government and Ofwat.¹

The guidelines clearly state that during the preparation and production of Water Resource Management Plans (WRMPs), '*the Plan should have strong links with other plans, including the need for the WRMP to consider and explain how it links with other local plans produced by local authorities*', in this case the adopted Local Plan 2031 Part 1: Strategic Sites and Policies. This is a legal requirement set out in Section 2.1 of the Water Resources Planning Guidelines.

The Council highlight that the draft WRMP should acknowledge and consider how the proposal will comply with Core Policy 14: Strategic Water Storage Reservoirs of the adopted Local Plan 2031 Part 1. This policy sets out criteria for assessing any proposals for a reservoir. For example, any proposal must mitigate the impact of construction on local people, the environment and roads (criteria i.), minimise the effect on the landscape, through its design, general configuration and the use of hard and soft landscaping (criteria ii.), maximise the creation of wildlife habitats and biodiversity (criteria iii.) and, where possible, minimise any impact on the archaeological significance of the site (criteria viii.).

It is unclear how these matters have been considered in the preparation of the draft WRMP.

The Council recommend the criteria included in Core Policy 14 of the adopted Local Plan 2031 Part 1 is taken into account during Thames Water's assessment of the proposed reservoir between the villages of Drayton, East Hanney and Steventon, in accordance with the legal requirements set out in the Water Resources Planning Guidelines.

Proposed Reservoir at Abingdon

The Council remain to be convinced that the proposed reservoir at Abingdon is necessary or effective, or would be the optimal and most appropriate solution to address the future water needs of the South-East of England.

This includes the proposal for the delivery of a 150Mm³ (Million cubic metres) reservoir in the early 2040s between the villages of Drayton, East Hanney and Steventon. However, there is insufficient assessment of how the potential impacts would apply to each option across the South-East region, other than the likely environmental and social effects assessed through the Strategic Environmental Assessment (SEA), which provides a high level assessment only.

¹ Natural Resource Wales and Environment Agency (2016) Final Water Resources Planning Guideline, available at: <https://naturalresources.wales/media/678424/ea-nrw-and-defra-wg-ofwat-technical-water-resources-planning-guidelines.pdf>

The Council consider that this draft Plan seeks to establish the principle for constructing a new reservoir between the villages of Drayton, East Hanney and Steventon, but does not appropriately assess the specific scheme or identify and assess the potential implications of this scheme and other schemes in sufficient detail e.g. landscape impact, biodiversity, heritage impact, highways, flood risk etc.

Additionally, an SEA has been undertaken by external consultants Cascade and Ricardo, on behalf of Thames Water, to help inform decisions on a best value set of options to balance supply and demand. However, this presents a high level assessment of the likely social and environmental effects of the draft WRMP, with limited focus for identifying the potential implications associated with each water resource option.

The Inspector's Report following a public inquiry in 2010 into Thames Water's draft WRMP 2009 concluded that *'the level of environmental assessment which has been applied through the SEA does not provide a detailed analysis of the environmental impact of the Upper Thames Reservoir [UTR] in comparison with alternative strategic schemes'*². The Inspector continued to state at paragraph 13.4.81 as follows:

*'I am not convinced that the criteria which Thames Water has chosen provide a sufficiently robust assessment to adequately test the environmental impact of a major supply side project such as the UTR as proposed in the revised draft WRMP [rdWRMP]. Since the assessment is carried out at a strategic level, and in view of the deficiencies in the criteria chosen, I find that it does not provide an adequate evaluation of the UTR and those schemes which might provide an alternative to the UTR. As a result I consider that the SEA fails to demonstrate that the UTR would be the best option to meet the need (assuming it is proven) for a major new water supply infrastructure project'*³

The Council consider that the environmental, highway and landscape impacts associated with the future construction and operation of a reservoir of this scale and magnitude, on the residents of the Vale, would be so great that significant detailed assessment is required to demonstrate that alternative sites have been properly explored within the South-East region for their suitability for such a reservoir.

The Inspector's Report also concluded, at paragraph 13.4.89, that:

*'there are deficiencies in the application of criteria in the SEA which undermines the robustness of the assessment. Furthermore, it fails to provide an adequate level of detail to enable a proper comparison of alternative strategic options for the preferred programme. As a result I find the SEA to be inadequate in terms of providing a sufficient level of detail to be able to assess the significant effects of the strategic proposal in the plan (the UTR) and alternatives to it.'*⁴

² Report to the Secretary of State for Environment, Food and Rural Affairs (2010) Inquiry into the Thames Water Revised Draft Water Resources Management Plan 2010-2035, paragraph 13.4.82

³ Report to the Secretary of State for Environment, Food and Rural Affairs (2010) Inquiry into the Thames Water Revised Draft Water Resources Management Plan 2010-2035, paragraph 13.4.81

⁴ Report to the Secretary of State for Environment, Food and Rural Affairs (2010) Inquiry into the Thames Water Revised Draft Water Resources Management Plan 2010-2035, paragraph 13.4.89

It is pertinent to note the Inspector's conclusions following the Inquiry, which stated that *'once the UTR is identified in a National Policy Statement, significant weight would be attributed to the need for the UTR, and there would be little scope to challenge either the need for the UTR or whether the UTR is the best option to meet the need..... The WRMP is the process most suited to establish need and to identify the best option to meet need'*.⁵

The Council consider that the draft Plan should take into account the design of each option and its likely impacts, for example landscape, highways, biodiversity, flood risk etc. in significant detail before any decisions are taken on which option is the most appropriate, in accordance with the findings of the Planning Inspector presiding over the 2010 Inquiry.

Public inquiry

The Council is aware of Thames Water's timescale for the submission of their draft WRMP (expected in September 2018) and recognise that, ultimately, Government will decide whether it is necessary to hold a public inquiry or whether to adopt the draft Plan in its current form.

The Council highlight the Inspector's Report following the public inquiry into Thames Water's draft WRMP 2009, at paragraph 13.4.2 which stated that *'the key issue identified by Defra in calling for an Inquiry into the rdWRMP relates to the provision of "adequate justification for your preferred options or the decision process in reaching that preferred programme of options", and "significant unaddressed representations – concerned mainly with options appraisal and the preferred programme"*⁶.

Given the scale and magnitude of Thames Water's proposal, and for the reasons provided above, the Council is of the firm view that a public inquiry should be held to further examine the draft WRMP to ensure a correct process has been followed and the implications for each 'option' have been fully assessed and explored in an appropriate level of detail.

The Council recommend that a public inquiry is held to further examine the draft WRMP to ensure a correct process has been followed and the implications for each option have been fully assessed and explored in an appropriate level of detail.

I trust the response provided above is helpful and will assist Thames Water in revising their draft Water Resources Management Plan. If you have any particular queries please do not hesitate to contact the Planning Policy Team at planning.policy@whitehorsedc.gov.uk or telephone the Customer Services Team on 01235 422600

⁵ Report to the Secretary of State for Environment, Food and Rural Affairs (2010) Inquiry into the Thames Water Revised Draft Water Resources Management Plan 2010-2035, paragraph 13.2.24

⁶ Report to the Secretary of State for Environment, Food and Rural Affairs (2010) Inquiry into the Thames Water Revised Draft Water Resources Management Plan 2010-2035, paragraph 13.4.2

Yours faithfully

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Vale of White Horse District Council