

Planning

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Dear Sir or Madam,

**Water Resources South East
Developing our 'Best Value' multi-sector regional resilience plan; a
consultation on our objectives value, criteria and metrics February 2021**

Thank you for consulting us on the above document. These comments are made on behalf of the Vale of White Horse District Council. Our Council is responding to this consultation as we wish to ensure that all water supply options are given full and appropriate consideration in the draft Water Resources South East Regional Resilience Plan that will be published in January 2022.

As set out in our response to your previous consultation (6th November 2020), our Council and Oxfordshire County Council have raised concerns in the past regarding a proposal for a reservoir between Abingdon, Steventon and East Hanney, now known as South East Strategic Reservoir Option (SESRO). Thames Water and Affinity Water are jointly promoting this proposal and land is safeguarded for the reservoir in the Vale of White Horse Local Plan. The WRSE website highlights that the Water Companies (Affinity and Thames Water) plan the reservoir for completion in 2037/2038. The development of the WRSE Regional Resilience Plan will be a key point in the process of deciding whether the reservoir is likely to be needed.

The Council remains to be convinced that the proposed reservoir at Abingdon is necessary or effective. The reservoir may not be the most appropriate solution to address the future water needs of the South-East of England. The reservoir may also have a significant impact on the natural environment and could potentially increase flood risk in a local area where there are known existing issues. The construction of a reservoir will significantly impact on residents living close to the site and new housing and employment development proposed close to the site.

It is noted that this consultation document contains no references to the reservoir other than we are aware that it is one of many 'options' that are referenced on page 3 of the document.

Our Council is concerned that without this context it is not clear to those reviewing and responding to this consultation what they are being asked to comment on. This is highlighted in our response to question 6 below.

We have responded to the questions set out in the consultation paper and then provided some further comments below this.

Question 1: Do you agree with the objectives for our 'Best Value' regional plan.

These are all positive objectives, but we have the following recommended changes;

Long term environmental benefits – The Plan objectives should seek to achieve both short and long-term environmental benefits. For example, the new plan should guard against any immediate damage to the environment from schemes required to support the Plan. For example, some of the 'options' under consideration will release more greenhouse gases (carbon) into the environment than others. This may have a long-term impact that may never be able to be effectively off-set.

Question 2: Is the way in which we will assess 'Best Value' clear and understandable? If not, please explain why.

The consultation document is clear and easy to read. However, we consider that further information should be provided on how 'best value' will be assessed.

Page 3 of the document provides a clear diagram entitled 'process overview' but we have concerns about what is set out. For example, the document indicates; '*we are consulting here*' on the '*decision making frameworks*'. The process overview diagram also indicates that the '*planning challenges*' and '*options*' have already been identified and considered. We believe that much more detailed information about the assessment of the different options that will form part of the plan should be provided and consulted on before the decision-making framework is agreed.

Some of the known options will have a significant impact on the environment through greenhouse gas emissions. Until all the information about the different options is published, it is difficult for us to comment on what the plan objective and the '*value criteria and metrics*' should be.

Question 3: Do you agree with the optimised criteria and metrics we will use to develop and identify the 'Best Value' water resources programme.

No, we're not able to agree with the '*optimised criteria and metrics*' without further information. As set out in our response to previous questions, it is difficult to comment on what these should be without an assessment of the options under consideration being provided alongside this. Notwithstanding, we wish to make the following comments;

Deliver a secure and wholesome supply of water to customers and other users to 2100

'50% reduction in leakage by each company by 2050' – As the plan will look ahead to 2100 is a more stringent target than 50% by 2050 required? The water companies should aim much higher than this.

'Customer preference' – We are concerned about the amount of weight that may be given to 'customer preference'. As the plan is looking longer term ahead to 2100, should current customer preferences be given substantial weight when considering future water resources? Future customers are likely to have a very different views and outlook to customers today.

Be deliverable at a cost that is acceptable to customers

It is difficult to comment on what impact these value criteria will have for the programme, but additional monies spent now could result in better outcomes for future generations. For example, a programme that chose to focus on lower environmental impact (carbon footprint) could be more expensive to deliver now but would have greater benefits (and potentially lower costs) for future generations. It is not clear how this is picked up by the suggested criteria.

Deliver long term environmental benefits

This section includes two value criteria that we are concerned about, these are;

- Enhancement of Natural capital (£m) – The document states that *'natural capital will be used to measure any additional value created by the shortlisted programmes'*.
- Biodiversity – This will be measured by a *'net-gain'* score.

Our Council welcomes the water companies' commitment to enhancing natural capital and biodiversity gain. However, we note that there are no criteria that contain a commitment to minimising carbon footprint.

For example, a scheme that includes a reservoir could contribute to biodiversity 'net-gain' by providing somewhere for wildlife and an accompanying tree programme.

Fixing leaking pipes, or measures to reduce water consumption from dwellings or transferring water from other regions may not score any points against these criteria but in comparison to a reservoir project these measures could have significantly less impact on our existing natural environment and a much lower carbon footprint.

'Carbon' – The measure used here is 'cost of carbon offsetting'. This signals an intention to provide a programme that will result in significant greenhouse gas emissions. Instead the measure should not be off-setting but the objective should be to deliver a Plan with less harm to the environment that reduces the water companies' carbon footprint.

For example, schemes such as water transfer through a pipeline or reducing leakage may require limited 'carbon offsetting' in comparison to building a new reservoir. Schemes that do not contribute any carbon should be given a higher priority through any assessment.

Finally, a number of the options include a reference to; 'avoid double-counting' – where this expression is used, what it means should be clarified.

Increase the resilience of the region's water systems

'Evolvability' – It is not clear what the justification is for this criteria? This could favour schemes that can 'evolve', but those schemes may not necessarily be the most preferable course of action. If this is intended to deliver cost savings then this should be highlighted.

Proposed additional/alternative 'best value' criteria and metrics

The following additional criteria should also be considered;

- As highlighted above, those programmes that have a limited carbon footprint or impact on the natural environment should be prioritised over those that do.
- Programmes that will not impact on the delivery of other social objectives, such as the delivery of new houses, should score more highly. For example, the delivery of new homes near to Abingdon could be impacted by the proposed reservoir.
- Impact on the local highway network including the length of time works will take and the amount of disruption to local roads. A reservoir scheme, for example, will result in significant disruption to the local highways network for a long period of time.
- Scoring for sensitivity – some projects, such as a large reservoir scheme, are likely to meet with strong opposition in their locality if they are not perceived locally to bring benefits to that area. Those projects that directly benefit those in the locality where they are delivered should be prioritised.
- The objectives of the plan could include a target for reducing water consumption by individual households. The Vale of White Horse District Council's Local Plan 2031 Part 1 (Core Policy 40: Sustainable Design & Construction) requires new development to be designed to a water efficiency standard of 110 litres/head/day (l/h/d) for new homes. The water companies should seek to introduce new measures to encourage the take up of other measures to reduce water consumption (e.g. water meters) within existing properties and work with Government and other local authorities to introduce similar targets (to that in the VOWH Local Plan) for new build homes.

Question 4: Should these regional policies also be included as value criteria and, if so, should they be a constraint or used to optimise the alternative water resource programme?

With reference to the examples given, we consider that the plan should place a high priority on transferring in water from other regions where it is needed (bullet point 4

in the consultation). If the water companies operating in neighbouring regions have different environmental standards, then this could be addressed through working together with them to agree similar standards and overcome this.

Question 5: Do you agree that all the criteria should be equal or should some be given more weight within the plan? If so, which ones should have a higher weighting applied?

No, some criteria should have a higher weight applied where they are considered. Any scheme options or measures that have a lower or no impact on the natural environment should be prioritised over those that do.

As the Regional Plan looks far into the future, meeting the needs of future customers should also be given significant consideration.

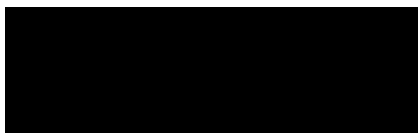
Question 6: Do you understand the engagement process we are following to identify our preferred 'Best Value' regional plan and are you clear on how you can get involved and input?

No, it is helpful to have a good number of stakeholder events and consultations, but it is not easy to interpret what the information means for local authorities or our local area.

It is also not clear how information collected from the engagement events and how these consultations will be used to influence the plan. It is recommended that the necessary background information, such as the options under consideration, are published and easy to access as part of future consultations.

Please keep us informed of any further consultation documents, including the draft Regional Plan and please do not hesitate to contact us if you wish to discuss any matters relevant to our Council.

Yours faithfully,

A solid black rectangular box used to redact the signature of the Acting Planning Infrastructure Team Leader.

Acting Planning Infrastructure Team Leader - Planning Policy