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Friday, 22 October 2021

Dear Sir or Madam

RAPID gated process Representation to draft decisions at gate one

These comments are made on behalf of our Council in response to the invitation to make representations on the gate one draft decisions document published on 14th September 2021.

General comments

The draft decision is that all schemes submitted should pass through to 'Gate 2'. The 'Standard Gate One Themes and Assessment Overview' explains that '*we expect solutions to progress unless they are shown not to be viable or there is another showstopper, which cannot be mitigated*'.

Our Council supports the need to develop long term solutions to plan for our future water needs. However, we are concerned that this process appears to only support the development and funding of those solutions that the water companies choose to progress and that a similar programme of incentives and funding is not available to support and encourage smaller and more innovative projects? There may be preferable alternative solutions to the opportunities identified by the water companies, but the gated process does not appear to allow or encourage groupings of smaller scale alternatives to be funded or encouraged.

Many of the schemes being considered as strategic options will have significant adverse impact on the environment and the communities in which they are located. Our Council and our partners at Oxfordshire County Council consider that no strategic solution should be pursued without a full understanding being published of the forecast need for additional water and the water savings that can first be achieved through reduced pipe leakage, innovation and reduced water consumption.

We consider that the regulator for example could do more to encourage water companies to pursue more innovative solutions to meet future needs.

It is noted in your letter to Vale of White Horse Councillor Cooke (15th October 2021) that the gated programme is not designed to be comprehensive and does not for example, include the Thames Estuary desalination option. Our concern is that the gated process appears to support, prioritise, and promote large schemes rather than support batches of schemes that come forward that could provide a more innovative and potentially less environmentally damaging solutions to meeting future water needs.

Abingdon Reservoir SESRO

The reservoir proposed at Abingdon (known as SESRO) within our District is a good example of this. There may be alternative options to placing a large reservoir in a single location in our District but there appears to be limited incentives available to encourage the water companies, like Thames Water, to prioritise bringing forward multiple alternative solutions or justify why this is the best solution.

The proposal for a large reservoir in the location proposed was strongly resisted by our local communities when it was put forward previously and no permission for the scheme was granted. The proposal put forward by Thames Water at Gate One appears to be very similar to that strongly resisted by our community previously. The large scale of the proposal will have a negative impact on our existing communities during its 10 year construction period. It will also impact our plans to provide new homes for our local community, such as a new Garden Village at Dalton Barracks and plans for a new rail station at Grove.

We are further concerned about the Climate Emergency. Tackling the Climate Emergency is a key theme of our Corporate Plan 2020-24. In contrast, we observe that this process appears to give very limited consideration of the impact from these proposed solutions on climate change. For those schemes, such as the SESRO it may not be possible to offset the large carbon footprint associated with the proposed development.

As the need to tackle the climate emergency grows increasingly evident, it is recommended that this process is urgently reviewed to ensure that alternative options are encouraged to come forward that have a lower carbon footprint and less impact on the environment.

River Severn to River Thames Transfer (STT)

Our Council is also concerned about the proposed Severn to Thames Transfer which will run through our District. In comparison with the SESRO project, more limited information has been provided by the water companies.

The Draft Decision on the Severn to Thames transfer records on page 8;

'We consider that the progress and quality of the work presented in the gate one submission in this area was satisfactory, however the submission fell short of expectations in some areas. This includes the extent of evidence in environmental

assessments to understand environmental impacts and risks, and extent of monitoring plans to address this understanding.

This indicates that there could be a significant environmental impact, from this project. It is also not clear, as for the reservoir proposals, whether it is possible for this solution to achieve net biodiversity gain. Yet this project has been allowed to proceed to the next gate. Due to these potential environmental impacts and risks, it could be more appropriate for the regulator to require additional information from the water companies before progressing this solution to the next gate. Information on the carbon footprint of this scheme should also be made public.

Conclusion

As highlighted above, our District has significant concerns about the two major infrastructure proposals being promoted by Thames Water in our district.

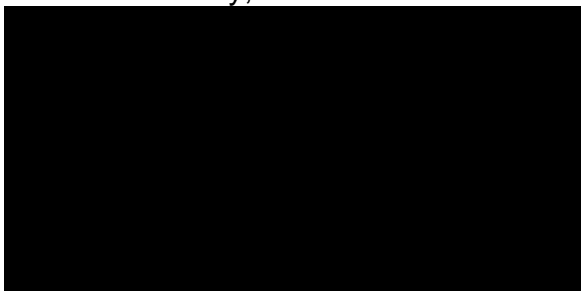
As the need to tackle the climate emergency grows increasingly evident, it is recommended that the process for addressing water shortage is urgently reviewed to ensure that a multitude of less impactful and innovative alternative options are encouraged to come forward from the water companies. These should be required to have a lower carbon footprint and less impact on the environment.

The water companies should be adequately challenged to pursue water savings for example, through reduced pipe leakage, innovation, and reduced water consumption before any of these major infrastructure projects are taken forward.

It is noted that there has been a deadline extension for comments on SESRO, the Council therefore may make additional comments before the end of the consultation period in relation to SESRO.

Please could you acknowledge receipt of this letter and we trust that you will act to address the concerns that are set out above.

Yours sincerely,



cc: Andrew Down – Deputy Chief Executive