

# Policy & Programmes

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Dear Sir or Madam

## **WRSE - Futureproofing our water supplies – A consultation on our draft Best Value Regional Plan for South East England**

Vale of White Horse District Council is responding to this consultation as we have a number of concerns about the Water Resources South East (WRSE) draft Best Value Regional Plan, including that the draft plan has not made a proportionate assessment of supply and demand nor has it prioritised the available options correctly, and because we object to the large strategic reservoir proposal within our district.

In response to your previous consultation (14 March 2022), our Council and Oxfordshire County Council raised concerns about the 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. Since then, the proposed SESRO reservoir has been included in the recently released drafts of the water companies' Water Resources Management Plans (WRMPs). It is noted that these draft plans are currently available for public consultation alongside the WRSE Plan.

Whilst non-statutory, the draft WRSE Plan is a key point in the process of deciding whether the reservoir is likely to be needed. Our Council (and Oxfordshire County Council) object to the inclusion of the SESRO within the WRSE Plan. Our Council considers that the SESRO should be removed from the regional plan and any other water company management plans. On 8<sup>th</sup> December 2021 our Council agreed a motion to;

*'reaffirm its position from the previous public enquiry that it opposes the reservoir proposal unless or until the case for need for this specific solution (over and above the other potential cheaper, less disruptive, and less environmentally impactful solutions) has been clearly tested, demonstrated and agreed by independent scientific experts.'*

We also object to the proposed early delivery of SESRO, which is planned as a solution to be delivered by 2040. Our Council considers that the water companies should instead be focusing efforts on improving water efficiency and fixing leaks. There are other proposed 'strategic resource solutions' which merit further investigation, such as the proposed water transfers which could instead be brought forward first. The water companies and WRSE should wait until further investigative work on the other strategic resource options has been completed before choosing to bring SESRO forward before other solutions. If more effort and expenditure is put into developing these alternative solutions, then the SESRO may not be needed in any future plan.

Our Council objects to the plan as currently sets out and recommends that the water companies and the regulators carry out further research on the suitability of the other water resources schemes before advancing the SESRO in the WRSE Plan.

### **Consultation questions**

We have responded below to the consultation questions;

**Q1) Our draft regional plan looks 50 years ahead. It plans to increase resilience to drought and address the potential shortfall in water as a result of climate change, population growth and increased protection of the environment, by taking an adaptive planning approach. Do you think the draft regional plan addresses the scale of the challenge we face in the future through our adaptive planning approach?**

#### **Strongly disagree**

The draft WRSE regional plan acknowledges the scale of the challenge we face but the solutions it presents to the challenge are not the right ones to address it.

We are facing a climate emergency. Our Council is committed to doing everything we can to help tackle the Climate Emergency. As set out in the [Vale of White Horse Corporate Plan 2020-2024](#) our climate targets are for the Vale to be a carbon neutral council by 2030, to reduce all emissions across the Vale district by 75% by 2030 and to be a carbon neutral district by 2045. The solutions proposed by the water companies to tackle the climate emergency should not include solutions that have a large carbon footprint like SESRO and would severely impact the local environment in which it would be located. The construction of a reservoir in our district will increase our district's carbon emissions and adversely impact on the district's ability to become carbon neutral by 2045.

Our Council is very concerned that it is proposed to complete the South East Strategic Reservoir Option (SESRO) near Abingdon, Oxfordshire by 2040 in all scenarios. This decision is being made without proper consideration of alternatives such as bringing forward water transfers, making more progress with addressing water efficiency, fixing leaks and prioritising schemes for recycling water or desalination. More schemes that seek to provide water closer to where it is needed should be prioritised.

Our Council considers that the best value criteria need to be re-evaluated to better consider the environmental impact and carbon emissions associated with the projects in the WRSE plan.

As part of its submission to RAPID, the [SESRO Carbon Report](#) (prepared by Thames Water and Affinity Water, July 2022) identifies significant carbon emissions associated with the construction of the proposed bunded reservoir. This is not the case for all of the other strategic resource schemes under consideration. The report highlights that capital carbon emissions are higher for the larger reservoir capacity variants due to the increased scale of embankment works required. Significant carbon emissions are also associated with the road construction, tunnels and other structures required to support SESRO.

It is clear from the information provided in the SESRO Carbon Report that all options for this reservoir will result in significant carbon emissions. The report refers to Thames Water carrying out work to investigate mitigation for the carbon emissions. For example, low carbon fuels for construction vehicles or low carbon earth moving equipment. However, these technologies are not widely available yet.

It is not clear why this scheme that will result in major carbon emissions is being prioritised over smaller, less environmentally destructive projects.

In addition to the carbon emissions, there will also be significant impacts on those living near to the reservoir from this major construction project and local residents are concerned about this.

We also have concerns regarding:

- Landscape impact from the bunded reservoir
- What the proposal means for flood risk in the local area.
- Diversions of the existing road and rights of way network through the site.
- Amendments to the route of the Wilts & Bucks canal, which is safeguarded in the local plan to run through the site. Thames Water is proposing to re-route the canal around the reservoir, potentially adding to the cost of its eventual restoration.
- Replacement of the solar farms located on the site.
- Air quality impact from construction.
- What recreation benefits a bunded reservoir can provide.
- Whether biodiversity net gain can be achieved and the potential impact on protected species living on or near the site.
- Impact on archaeology.

It appears that the assessment behind the WRSE Plan is giving more weight to large scale solutions (like the SESRO) despite their significant impact on the environment and carbon emissions and the concerns identified above.

This project will not be quick to deliver and there are other more sustainable solutions that should be prioritised ahead of the SESRO. For example, the Plan indicates (page 28) that the Severn to Thames Transfer has a reported pathway of completion by 2050, but we understand this scheme could come forward much sooner and be delivered more quickly than the SESRO.

The information provided on page 29 of the Plan indicates that SESRO is required whatever pathway is taken, yet this doesn't apply to other schemes e.g. Severn Thames Transfer, Brent Reservoir in North London, Blackstone reservoir. Our Council requires greater justification for the decisions being taken than is set out in this document. All of the RAPID schemes should be investigated fully before taking the decision to prioritise SESRO.

As highlighted in our previous response to the emerging WRSE regional plan, there are over-estimates in the number of customers projected for the region, based on the population data and population growth forecasts. This information should all be updated to reflect the more accurate information provided by the ONS 2021 Census.

Our Council is also concerned about the weight being placed on customer surveys. We have reviewed the Customer Engagement Method. It is likely that customers were not made aware before providing their responses, of the potential carbon emissions associated with their choices and the associated long term impact on climate change.

**Q2) Our draft regional plan has considered the needs of other sectors and how their demand for water could be met in the future.**

**Do you support us continuing to work with other sectors so our regional plan fully embeds their future needs and includes appropriately-funded solutions to meet them?**

**Disagree**

WRSE should work with other sectors to recognise their current and future water needs. However, these sectors may not require water of drinking water quality. Thames Water and the Government should work with other sectors to ensure that those who require water are doing all they can to reuse and recycle water within their sites using the technology available. The solution to meeting future water requirements of all users should come through the reuse and recycling of water by all users, not major infrastructure schemes, such as reservoirs, that have a harmful impact on our climate and environment.

**Q3) The draft best value regional plan includes investment in new water supplies and activity to reduce the demand for water. The draft plan identifies that nearly 60% of the water needed by 2075 could come from demand management activities. This includes reducing leakage by at least 50%; extensive water efficiency through smart metering, customer behaviour change and new government policy; and the continued use of temporary**

**restrictions on water use during periods of drought. The rest needs to come from a mix of new supplies. Do you think the draft regional plan strikes the right balance between reducing demand for water and developing schemes to provide new water supplies?**

### **Strongly disagree**

No, the plan does not strike the right balance between reducing demand for water and development schemes to provide new water supplies. The plan should prioritise other options such as water recycling close to where it is needed before making a decision to support the SESRO scheme.

More should also be done by the Government (working with Local Government) and the water companies to reduce demand for water. Whilst the water companies' new draft Water Resource Management Plans do more to address how we reduce water usage in our homes than the previous WRMPs, they could go much further.

The energy crisis and increase in costs has made many of us think more carefully about how we use energy in our homes. The water companies and Government should consider whether more could be done to encourage us to reduce our water consumption. For example, more incentives could be introduced to have a smart meter, and to encourage customers to harvest rainwater and store water it for gardening and non-drinking water uses like flushing WCs. We would like to see new housing include provision for storing water, for example in gardens or underground. If implemented now this could greatly reduce consumption and the need for large infrastructure schemes.

We are concerned that the plan has been based on figures for water use per capita that are not ambitious enough: 115 litres per person by day by 2050 across the South East region. If this was significantly lower and introduced sooner, this would reduce the need for new strategic solutions to meet demand. In January 2023 the Government launched the Environmental Improvement Plan, containing new potential water efficiency standards for new homes with a baseline of 105 l/p/d, with a higher standard of 100l/p/d where there is a local need. The WRSE Plan should now be revised to take this into account. As a local planning authority, we are willing to help Government and the water companies explore this in our district through our next local plan.

We are concerned (see page 27) that the draft regional plan assumes that Government will delay bringing in new building regulations as late as 2040 (or possibly even as late as 2060). We would anticipate new standards coming forward much sooner. By using these assumptions, the WRSE Plan has over estimated the amount of water that will be needed.

The water companies should also be challenged to do more to fix leaks. Our Council considers that not enough is being done to replace pipes and identify leaks. The WRSE plan should set out bolder plans for finding solutions. The Council considers that temporary restrictions or 'hosepipe bans' can be justified when water demand is at its highest.

**Q4) The draft best value regional plan promotes increased collaboration between water companies in the development of new water sources and the construction of more transfers to move water around the region and share it between companies**

**Do you support the increased collaboration between the water companies in the South East and other regions, through the development of shared resources and an enhanced network to transfer water around the region and between regions?**

**Agree**

We support increased collaboration between the water companies in the South East and other regions, particularly on transferring water where it is practical to do so. More work is needed to establish how the water transfers could work in practice. We do not support the inclusion of SESRO. As highlighted in our previous answers, the reservoir should not be progressed first when the water transfers could come forward more quickly and at a lower environmental, financial and carbon cost than the reservoir.

Our Council considers that the water companies' collaboration should not be limited to developing new infrastructure. Instead, the water companies should work together to share best practice on how to reduce water demand and fix leaks. The water companies should support Government with updating the building regulations.

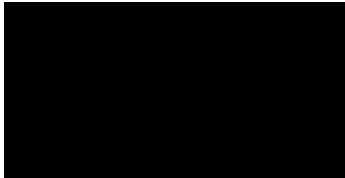
However, our Council is concerned about the impact of the potential transfer pipeline proposed from Thames Water to Southern Water. This will route through an Area of Outstanding Natural Beauty and it is not clear at present if this scheme is needed. It could be more appropriate for further water recycling schemes and a desalination plant to instead be developed closer to where water is needed.

Finally, page 35 of the document refers to *'catchment and nature-based schemes that improve the water sources we rely upon'*. Unfortunately, the draft WRSE Plan does not provide any detailed schemes, despite identifying 200 potential catchment and nature-based schemes in the emerging regional plan. This is very disappointing and highlights that this plan is flawed. These schemes could deliver multiple benefits. It is a missed opportunity that no schemes are included in the document and instead the water company focus is only on large water resource schemes. This is not the case with other regional water resources documents, which do include nature-based solutions at scale to address water-related challenges. In the South-East where there is a greater need for water, WRSE should be identifying these types of schemes to come forward.



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,



**Planning Infrastructure Team Leader  
Vale of White Horse District Council**

cc: Andrew Down – Deputy Chief Executive – Partnership and Planning  
Harry Barrington-Mountford – Interim Head of Policy and Programmes