

Thames Water Draft Resources Management Plan 2024

Consultation

Your feedback

Question	Your response
<p>We've chosen to aim for the highest level of environmental improvements. This is supported by our regulators. We'll be tracking the benefits of our work as we carry it out and will adapt our approach as we learn more. Do you have any comments on our approach?</p>	<p>Aiming for the highest level of environmental improvements is a good goal that we support. However, constructing a large reservoir will have a large environmental impact that does not appear to have been considered in the overall process. Smaller, better distributed water storage facilities would have a lesser impact on the environment. Storage linked to existing and proposed gravel extraction works could be a more joined up approach to storing water for future use, should it be required.</p>
<p>We've set out our plan for reducing demand, with government interventions, to achieve 123 litres of water per person per day on average. This is above the government's national target, but we think it's the right approach. We'll monitor and develop this by building on our learnings and evidence. Do you have any comments on our approach or suggestions for additional measures we could take?</p>	<p>We object to your approach. Thames Water should have a much more ambitious plan for reducing demand. In your question above you describe you target of 123 litres of water per person per day on average as “above the government's national target”, which is misleading, ‘above’ implying that your target is doing better, the reverse of the case here. Your ambition falls significantly short and is significantly failing the government’s national target. Your aim for 123 litres per person per day does not reflect the government ambitions for achieving improvements to water efficiency. Water companies are expected to plan for an average 110 litres of water use per person per day. 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 WRMP should be revised to take this into account. As a local planning authority, we are willing to work with Thames Water to support this in our district through our emerging Local Plan.</p> <p>We consider that the programme set out in the WRMP for fixing leaking pipes and reducing water consumption from dwellings should be significantly</p>

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	<p>expanded. Smart meters should be rolled out swiftly and widely. And, for example, has technology such as micro sensing to reduce in property leakage been considered to reduce demand? Could Thames Water fund water reuse projects such as grey water recycling and source collection and reuse?</p> <p>Thames Water has indicated in discussions with our authority that fixing the leaking Victorian water pipes in London is tricky because it causes significant disruption like road closure and parking bay suspensions. However, the scale of the proposed SESRO reservoir is such that it will cause major damage to a rural environment and the significant disruption in what is currently a peaceful rural area. It will also result in a loss of agricultural land and the wildlife living on the site will also be lost.</p> <p>Using innovative measures to fix leaks and reduce demand measures could have significantly less impact on our existing natural environment and a much lower carbon footprint than constructing a mega reservoir. The WRMP should be revised to prioritise fixing leaks and reducing demand for water over constructing a reservoir. Your lack of ambition on water efficiency and fixing leaks props up your water supply deficit calculations, fuelling your case for large scale strategic solutions like the reservoir proposed in Vale of White Horse district.</p>
<p>Measures to reduce demand for water make up over 50% of our forecast shortfall by 2050. Some of the activity is untested and not within our direct control. Do you think this is the right approach? Should we plan for additional new sources of water in case these measures don't deliver the water we've forecast?</p>	<p>Vale of White Horse District Council supports the intention to reduce demand for water but we consider that this target should be more ambitious. You should seek to reduce demand by 50% well in advance of 2050. We recommend that instead of planning for additional new sources of water in case measures don't deliver the water Thames Water has forecast, further alternative measures should be considered for reducing demand for water and fixing leaks. We note that you are losing 650 mega litres a day, or 24% of water, through leakage, and that Thames Water has among the worse performance on leakage of all water companies.</p>

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	<p>Your intention to increase the roll out of smart metering is welcome but this should be done more quickly than is set out in the WRMP. Thames Water could also encourage and facilitate customers to harvest rainwater and store 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. Thames Water should also invest in new technology such as no-dig 'pipe injection' techniques to plug existing leaks. Thames Water and the other water companies should also focus on working with farmers and landowners to provide more 'at source' storage.</p>
<p>A new reservoir is an integral part of our best value plan for the South East. Do you have any comments on the size of a new reservoir?</p>	<p>Vale of White Horse District Council objects to the proposed reservoir at Abingdon. We do not consider it is necessary or effective. It would not be the optimal and most appropriate solution to address the future water needs of the South-East of England.</p> <p>As set out in our response to the recent Water Resources South East consultation (20/02/2023), our Council is concerned that the proposed reservoir will result in significant carbon emissions during its construction.</p> <p>The project will also have significant impacts on those living near to the reservoir from this major construction project. This remains the case with a 100 million cubic metre reservoir as with the earlier 150 Mm3 proposal. It would damage the local environment and disrupt rural communities in Drayton, East Hanney and Steventon and the surrounding area. Local residents are understandably concerned about this.</p> <p>We have concerns regarding:</p> <ul style="list-style-type: none"> • 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

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	<p>network through the site.</p> <ul style="list-style-type: none"> • Building a reservoir on land safeguarded in the Vale Local Plan for the restoration of the Wilts & Berkshire Canal, without delivering the project, if the reservoir goes ahead. Instead, Thames Water is proposing to re-route the canal around the reservoir, potentially adding to the cost of its eventual restoration. Restoring the canal should be part of the proposals for the reservoir. • Loss of the solar farms located on the site. • Impact of construction on local people, the environment and roads. • What recreation benefits a bunded reservoir can provide consistent with the landscape and biodiversity values of the proposal and having regard to the traffic impacts of such uses • Whether biodiversity net gain can be achieved and the potential impact on protected species living on or near the site • Impact on the archaeological significance of the area <p>There is some information within the draft WRMP that indicates other reservoir options have been looked at – for example supplementary report ‘Feasibility Report Addendum – Reservoirs’. These alternatives appear to have been rejected for a number of reasons, but Abingdon appears to have been selected as no other sites could fit a large 100Mm³ + reservoir. Our Council considers the proposed reservoir is too large and smaller water storage (if required) should be instead considered at various locations across the river basin rather than being concentrated in one location. Thames Water should be siting storage at locations closer to the river or between meanders where water can be fed into reservoirs by gravity rather than relying on energy intensive pumping systems. Thames Water should also work with extraction industries to provide storage at locations where mineral working are approved.</p> <p>The large reservoir will have a significant environmental impact and significant carbon emissions associated with this large construction project. In light of this, it is unclear why the large</p>

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	<p>reservoir option is being pushed forward with all smaller options being taken off the table, without sufficient justification or explanation.</p>
<p>Do you have any comments on the new water source options included in our draft plan?</p>	<p>In addition to the proposal to construct a large reservoir in our district, there are also proposals for two water transfer pipelines; the Severn to Thames Transfer (STT) and the Thames to Southern Transfer (T2ST). There is also a pipeline proposal to link SESRO with Farmoor reservoir.</p> <p>Our Council is concerned about the proposed disruption to our residents from these proposed pipeline projects. Some of the pipelines proposed will run through our Areas of Outstanding Natural Beauty, with potential adverse impacts to habitats, views and archaeology in the AONB. If these pipelines are required (please see our response to earlier questions on fixing leaks and reducing demand), it is important that route planning minimises adverse impacts and that trenchless techniques are used where possible.</p> <p>The proposed Thames to Southern Transfer (T2ST) is conditional on construction of the SESRO. We consider that instead water to meet Southern Water’s needs in the Southampton area should come from solutions closer to where they are needed.</p> <p>A copy of our response to the draft Water Resources South East Best Value Regional Plan can be found on our website. As set out in our response we would like to see more schemes considered instead that provide water closer to where it is needed.</p>
<p>Do you think our draft plan represents the best value plan for you, your community and the environment?</p>	<p>No, the draft plan does not represent the best value plan for our community or the environment. The inclusion of the SESRO scheme, located within the Vale of White Horse district, cannot represent the best value plan for our Council, and ignores the cost to local communities and residents.</p> <p>We note that the WRMP indicates that the costs for investing in our future water supply will increase the average household bill significantly in the future,</p>

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	<p>reaching an extra £100 a year by 2050. Our residents, who are Thames Water customers, will not wish to pay for a plan that includes large construction projects that will impact on our local environment and contribute to climate change. More should be done more to encourage and incentivise householders to save water now, and to fix leaks, to avoid the high financial, social and environmental costs that are associated with major infrastructure projects.</p> <p>Thames Water should instead be focusing on encouraging customers to reduce their use of water and fixing leaks. If more work was undertaken by Thames Water to fix leaks and to encourage customers to save water and fix leaks, there may not be the need for the significant investment of constructing a large reservoir.</p>
<p>Do you have any other comments on our draft plan?</p>	<p>The plan has the proposed the SESRO scheme as its priority. However, there are many other potential alternative solutions that Thames Water could instead have explored.</p> <p>As set out in our response to the draft WRSE Plan, we are concerned that there may be 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.</p> <p>As a country 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 proposed SESRO has a large carbon footprint and through its construction 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</p>

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	<p>become carbon neutral by 2045.</p> <p>Currently, there appear to be few benefits being offered to local people from the proposed plans for SESRO, only negative impacts. Instead, if pursuing this option (which we do not support), Thames Water should more clearly set out a plan of appropriate mitigation. For example, this could include:</p> <ul style="list-style-type: none"> • Flood alleviation measures that will benefit Abingdon and the surrounding area and to ensure that the new reservoir will not increase flood risk within the local area; • Clear recreational benefits – around the reservoir through walking and cycling, plus bird watching and on the reservoir through a range of water sports and opportunities to fish; • Include measures to generate renewable energy from the development; • Plans for a replacement of the solar farm; • Providing a new section of the Wilts and Berks Canal; and • Commitment to biodiversity net gain <p>The Council calls for a public inquiry to be held on the need for SESRO and other proposals in the draft WRMP. This will 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.</p>
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Question	Your response
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