

# Policy & Programmes

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Dear Sir or Madam

## The RAPID gated process and the proposed water resource solutions

Vale of White Horse District Council is responding to this consultation as there are three water resources schemes located in or close to our district. These are:

- SESRO
- Severn to Thames Water Transfer
- Thames to Southern Water Transfer

Our Council is concerned that all the schemes put forward to RAPID are moving through to stage 3. We had understood that some schemes would fall away at Gate 2, but there appears to have been no shortlisting, which calls into question the value of the gated process. It means that public money is potentially being wasted on continuing to develop schemes that should fall out and not receive further financial support.

It is not clear what the process will be after this Gate. The diagram shown on the RAPID website now shows no clear end dates for Gate 3 or Gate 4 for the schemes under consideration. When the process was first developed, all schemes followed the same process that was clearly set out, but this is now being changed without explanation.

We further note that more money continues to be given to some projects rather than others. The RAPID website states:

*'The decisions at gate two are made by further examining the solutions in more detail, with focus on ensuring that funding for continued investigation and development of solutions is aligned to water resources planning. We welcome representations from stakeholders regarding these elements.'*

*Decisions about whether or not a solution goes ahead will be made through water resources planning and subsequently applications for local planning and environmental consents, not the through RAPID itself.'*

This latter statement suggests that RAPID takes no responsibility for the decisions that are being made about which schemes are advanced. By providing more funding and support to certain schemes, those schemes, usually those that are more advanced by the water companies (such as Thames Water's SESRO) will have an unfair advantage and progress quicker than others under consideration. The lack of clarity about the timescale for the next gate is therefore a concern, as those schemes which are joint projects are more likely to fall behind and be dropped. For example, there appears to be a new decision point added for the Severn to Thames Transfer project (where funding might potentially be withdrawn) but this is not the case for other schemes such as SESRO.

We are concerned that schemes like strategic reservoirs continue to be the preferred option for meeting our water needs. Projects as large as the SESRO are environmentally damaging and ramp up our district's carbon emissions as well as those for the wider south-east. It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (Climate Change Act 2008). This won't be achievable if the Government persists with supporting schemes like the SESRO that increase carbon emissions.

Instead of RAPID funding large strategic schemes (like SESRO), we would instead like to see RAPID instead funding a wider range of nature-based catchment management schemes. Such projects would ensure more water can be retained in the system whilst also managing flood risk and creating new nature reserves. These schemes can benefit nature and people and can most effectively be brought forward by working with local authorities. Instead, construction of major infrastructure schemes being supported with public money by RAPID will further contribute to the climate emergency through adding significant additional carbon emissions, damage the environment and landscape, and are likely to meet with significant opposition from local communities, who do not get to share in the benefits from the schemes that the solution owners (water companies) will benefit from.

Whilst these are Nationally Significant Infrastructure Projects (NSIPs), we ask that RAPID includes more in its Gate 2 decision letter to encourage the water companies to act on advice from the local planning authority and the highways authority on scheme development. There is more information on the Planning Inspectorate's website that explains the vital role local planning authorities have in contributing to the NSIP process, which you can find [here](https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/)<sup>1</sup>.

Whilst national bodies such as Historic England, Natural England and the Environment Agency etc. are able to assist with scheme development, unlike councils, they do not have local knowledge on the ground or democratically-elected representatives who can

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<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

help identify issues and suggest mitigation measures for what could potentially be very significant impacts upon the environment, people and places where these schemes are located. We suggest a few areas below where local planning authorities could be added to the decision letters.

More detailed comments on each of the schemes located in our districts are below.

## **SESRO**

Our Council objects to the progression of the SESRO scheme to the next gate. We object to further funding being given to a major construction scheme that is unpopular with the public and will contribute further to global warming and climate change, with its associated carbon emissions.

### *Comments on the draft decision text*

Our Council wishes to highlight the following concerns with the 'standard draft decision for SESRO' and in particular the 'Gate 2 Actions and recommendations' (Appendix A):

- (1) & (2) Solution design and (3) Evaluation costs and benefits** – Thames Water has decided to now look at a smaller scheme of 100Mm<sup>3</sup> but the RAPID evaluation is still based on a 150Mm<sup>3</sup> reservoir. This does not make sense to fund investigation of a larger scheme that is no longer being progressed. An alternative could be to fund a series of smaller schemes within the Thames catchment combined with nature-based solutions to improving water catchments? Why is a large reservoir the only solution under consideration and supported with public funding?
- (5) Programme and Planning** – why is the SESRO scheme moving to the next gate if RAPID has not received the relevant information on construction and procurement?
- (6) Environment** - Thames Water is advised to agree the landscape and visual impact assessment (LVIA) methodology with Natural England. Vale of White Horse District Council has specialist landscape officers and a major new suite of landscape studies are underway, being carried out by Land Use Consultants, to support the emerging Joint South & Vale Local Plan. As Local Planning Authority, we should be added to the list to have the opportunity to input into the Scoping and Methodology and this should be included in the decision letter.
- (7) Environment** – The Council welcomes the advice to Thames Water to work with the Environment Agency, but the Vale of White Horse Council and Oxfordshire County Council should also contribute to these discussions. The Vale of White Horse Local Plan 2031 (adopted 2019) includes safeguarding for land on this site to provide a flood alleviation scheme, and this was part of previous proposals for the reservoir. More recently, through discussions with Thames Water, an opportunity was identified for the SESRO site access road to be located on an embankment, creating a flood alleviation defence for Abingdon. The RAPID decision letter should require the scheme to include this in the solution design, as a joined-up project. There is a

clear opportunity on the SESRO site to reduce flood risk for local residents. Without this, the SESRO scheme could make the flood situation in Abingdon worse, and fail to meet the adopted Local Plan's safeguarding policy.

*Suggested additions to the decision – Construction and transport*

The RAPID decision should also reference and address the major impact of construction the large SESRO scheme would have on the local area. For example, where will construction workers live, how many will there be, how will they and construction vehicles access the site? As set out in our comments above, the regulator should be encouraging Thames Water to undertake engagement with the Local Planning Authority at this early stage and encourage construction matters to be addressed. On top of travel to work by construction workers, and assuming a 5 year construction phase, an estimated 70,000 construction vehicles preliminary estimated to access the site would result in an average of 56 construction vehicles per day ( $70,000 / 5 \text{ years} = 14,000 / 252 \text{ working days in a year} = 56 \text{ construction vehicles a day}$ ) added to the strategic and local road network. Whereas the average daily rail freight deliveries are estimated to be 2 trains per day, clearly a better solution. We request that further transfer of road freight to rail is required to optimise the provision of rail sidings and reduce road traffic impact. We are particularly concerned about the potential impact on the Air Quality Management Area in Marcham on the A415. It would be challenging to ensure that no construction vehicles or workers would not access the site via the A415 from the West.

A criticism of the visitor trip generation estimate used in Thames Water's submissions to RAPID on SESRO is that only car-borne journeys are considered, which have been replicated from the Havant Thicket reservoir assessment. However, we would like to highlight a change in transport planning methodology in Oxfordshire. The County Council has replaced the former 'predict and provide' approach, to which this SESRO assessment accords, to a new 'decide and provide' approach. 'Decide and provide' is where provision for travel by non-car modes forms a greater part of the assessment of impact and accordingly infrastructure provision. Vale of White Horse District Council would like to request that the new transport planning approach be used in further assessment of the impact of travel relating to both construction and operational phases of the scheme.

Our reservations about the impact of the scheme on highway capacity aligns with the initial modelling of the A415 and A34 junction at Marcham Interchange, as set out in the Concept Design Report findings at paragraph 2.119. We welcome the concluding statement in support of public transport and active travel mitigations, however work to assess infrastructure requirements and possible demands by other modes (than a car) have not been considered in any detail.

In Thames Water's submission to RAPID there is mention of "accommodation", but it is unclear if this is for working day needs of employees or overnight accommodation, and, if the latter, how many people this would cater for and thus reduce construction traffic during the build out phase. Services (including schools and GPs) could also be required to support workers and also their families, how will this be planned and accommodated?

As with the opportunity to design in flood relief for Abingdon (covered above on page 3 of this letter), the location of the 'railway sidings and material handling access' (see Figure 1, page 6) is also a potential opportunity to co-design schemes that must not be missed. Our Council, Oxfordshire County Council and local community strongly support provision of a re-opened station to support the growing community at Wantage and Grove, replacing the station that closed in 1965 as part of the Beeching cuts. The new sidings provided for the reservoir present an opportunity to help deliver this much needed railway station. RAPID should encourage Thames Water and Network Rail to locate the new sidings closer to Wantage and Grove so that this positive legacy of a new Grove station arises from the SESRO construction phase. Such a station could also benefit Thames Water by bringing in future leisure users by rail not car.

The Council requests that additional recommendations are made within Appendix 2 of the final decision letter to address the above.

#### *Suggested additions to the decision - Customer and stakeholder engagement*

Stakeholder and customer engagement for the SESRO scheme is a significant issue and requires further development. However, there is little comment in the RAPID decision about Thames Water's submitted 'Stakeholder and Customer Engagement' document for SESRO. This contrasts with information in the RAPID decision for the Severn to Thames Transfer, where the decision highlights that 25% of stakeholders reported negative feedback towards the water transfer. It is not surprising that there is limited negative feedback recorded by Thames Water about the proposed SESRO scheme from customers, because only a small number of those consulted across the Thames Water and Affinity Water areas are likely to live close to the proposed reservoir site.

Nowhere in the evaluation of the SESRO scheme does the RAPID decision pick up on the negative local reaction to the SESRO scheme. For example, please see recent article in the Guardian [here](#)<sup>2</sup>. There is a long-standing action group opposed to the SESRO development and the negative reaction to the proposals from the local community is very clear to our councillors and officers. As set out above, our council would like to see the regulators do more to challenge the water companies to provide mitigation with their schemes so that the local community can see that some clear benefits will be secured for the local community from the scheme, including the re-opening of Grove Station, a flood alleviation scheme for Abingdon, and restoration and re-routing of the derelict Wilts and Berkshire canal, the route for which passes through the site and will be obliterated by SESRO. This isn't a complete list of mitigations, but some examples.

It is concerning that instead of addressing the needs of those directly affected by the reservoir in the 'Stakeholder and Customer Engagement Report' or reporting on the mitigations highlighted by the local council, Thames Water have set out in detail

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<sup>2</sup> [Lake or mistake? The row over water firms, drought and Abingdon's new super-reservoir | Utilities | The Guardian](#)

‘Customer’s preferences on added value for large resource schemes’ (see paragraphs 4.10-4.222) [here](#)<sup>3</sup>.

Table 6 of the Stakeholder and Customer Engagement Report gives an overview of the Technical Liaison groups which Vale of White Horse officers have attended and references other discussions that have taken place locally. At these workshops officers from our council highlighted what mitigation is required for the scheme including (but not limited to):

- Inclusion of the Abingdon flood alleviation scheme
- Provision of rail infrastructure that could in the future be used to provide a new rail station for Wantage and Grove and allow people to access the reservoir for recreation by sustainable transport means.
- A new alternative route for the reinstatement of the Wilts and Berks Canal
- A detailed plan for construction management and how construction workers need will be met (e.g. access to the site, accommodation) to minimise impact on the community
- A plan to reduce carbon emissions during the construction process and for the operation of the reservoir to be net zero once it is operational
- A plan to achieve biodiversity net gain plus additional mitigation for the impact of the reservoir on the local environment
- Support for water sports and other recreational activity on the site
- Opportunity to provide new country park for our district, with an education and visitor centre
- Replacement of the solar farms that are on the site, which will be lost if the reservoir is constructed
- Provision of active travel routes between the reservoir and adjoining villages and towns (including Didcot and Abingdon) to support sustainable travel to the site
- Replacement highway links and rights of way for those that will be lost and improvements to the rights of way network as mitigation.

This information was also provided to Thames Water and Water Resources South East through our Council’s responses to their recent consultations. A significantly better mitigation offer could help alleviate stakeholder and customer concerns about the SESRO scheme.

This mitigation is not included in the Thames Water Gate 2 reports submitted to RAPID. **The scheme of benefits provided with the SESRO should be informed by consultation with those living closest to the reservoir, not those living long distances from the proposed development. As a public body and regulator, RAPID should make this clear in the RAPID decision letter.**

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<sup>3</sup> <https://www.thameswater.co.uk/media-library/home/about-us/regulation/regional-water-resources/south-east-strategic-reservoir/gate-2-reports/D--SESRO-Stakeholder-and-Customer-Engagement.pdf>.

## **River Severn to River Thames Water Transfer (STT)**

The Severn to Thames Transfer (STT) project scheme is being allocated much less funding overall (£83.62m) than the SESRO scheme (£121.72m). This is not equitable and could be considered as indicating a preference for the SESRO scheme over this one.

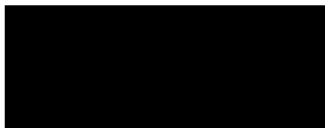
## **Thames to Southern Water Transfer**

Our council is very concerned about the potential route of this pipeline that is likely to pass through our district. It is currently suggested that the pipeline will need to go through the North Wessex Downs Area of Outstanding Natural Beauty, which is of concern because of negative impacts on the AONB.

We do not consider that there is currently a case for advancing this scheme at the current time. This is because the proposal is dependent upon either the SESRO or the Severn to Thames Water Transfer coming forward, there is not a clear case for this scheme progressing to Gate 3 at this time.

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**