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14th March 2022

Dear Sir or Madam

WRSE Futureproofing our water supplies – A consultation on our emerging Regional Plan for South East England

These comments are made on behalf of our Council in response to the invitation to make representations on the above document.

It is noted that customer preference from across the region is referenced as driving the plan. It would be helpful if this survey could be published.

General comments

Vale of White Horse Council objects to this Plan. The plan as currently set out promotes a proposal for a new reservoir near Abingdon known as SESRO. The Vale of White Horse Council opposes this reservoir proposal and the following motion was agreed at a Council meeting on 8th December 2021;

'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.'

Our Council is not convinced that the information provided in this Plan adequately justifies the need for a reservoir. It is considered that this document overstates the South East's water needs and considers that insufficient information is provided in the draft Plan to set out a compelling case of the need for the reservoir.

In addition, the WRSE website identifies that 1400 different options have been looked at but from all of these schemes only one set of options is put forward in this regional

plan for 2025-2040. Our Council considers that insufficient justification is provided within the document as to why SESRO is required to form part of the 2025-2040 and questions why alternative solutions from the 1400 options are not being presented.

There are also other large scale regional options being looked at and researched through the RAPID process (15 strategic regional options) and none of these are included as potential solutions to the South East's water needs for 2020-2040. The reservoir is clearly Thames Water's preferred option for meeting the needs identified, and this consultation does not invite any discussion about the other options that are available. For example, when starting a consultation on our development plan we would usually produce a range of options for consultation before presenting a preferred option. It is not clear why alternative options to the reservoir to support needs during the period 2025-2040 are not included in the consultation.

Our Council supports the need to think long term in planning for our future water needs but we do not consider that sufficient justification is being provided in the document to support the pathways set out in the document. The WRSE Plan solutions presented are not radical or forward looking and use old infrastructure solutions such as reservoirs when it could be more ambitious by:

- investing in nature-based solutions (such as improving river catchments through establishing nature recovery areas);
- encouraging consumers (including customers) to consume less and take responsibility for their own water use sooner,
- further considering additional water recycling and desalination facilities,
- working up solutions for water transfers and bringing them forward sooner.

Delaying these solutions to later in the WRSE plan period (for example, between 2040 and 2060) represents a missed opportunity to explore alternatives to old style solutions like the reservoir.

Climate change should be given a high priority. Our Council is very concerned about the Climate Emergency, tackling the Climate Emergency is a key theme of our Corporate Plan 2020-24. The 2021 United Nations Climate Change Conference (referred to as COP26) highlighted a need to accelerate action on climate change. Our Council considers that all plans and programmes (particularly those that look to the longer term) should include consideration of what is best for the environment and be driven by considerations about our collective future rather than customer preference (as the consultation suggests is the case for parts of this draft Plan). For example, water customers may not be fully aware of the wider impact of climate change and what the consequences are of the decisions we make now for future generations. We may not all yet recognise or acknowledge that behaviour change is a way in which we can address the climate emergency.

Our Council has a target for achieving a carbon neutral district by 2045. As the need to tackle the climate emergency grows increasingly evident, the WRSE document should have included more information about the carbon footprint of all of WRSE's proposed solutions. For schemes such as SESRO we don't think it will be possible to offset the large carbon footprint associated with the proposed development. Low carbon and the least environmentally damaging solutions are needed, and the carbon footprint of any infrastructure schemes included in the plan should be a key

factor in choosing between options. This draft WRSE Plan appears to give very limited consideration of the impact from the proposed solution of a reservoir on climate change.

Abingdon Reservoir - SESRO

The Council considers that the need for including the SESRO reservoir in this document is not sufficiently justified. Our Council considers that only basic information has been provided to justify the need for it and why it is preferable to other solutions that are potentially cheaper, less disruptive and have less impact on the environment.

The proposal for a large reservoir in the location proposed was strongly resisted by our local communities when it was put forward previously. The proposal included in the WRSE Plan appears to be very similar to that strongly resisted by our community previously.

Set out below are some issues and questions that have been raised by councillors and officers about the reservoir proposals;

The scale of the proposed reservoir is much bigger than the other schemes put forward in the plan. Large infrastructure solutions are known to have delivery issues and potentially a large negative impact on host communities. The large scale of the proposal could have a negative impact on our existing communities during its 10 year construction period. It could 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. For example, could it potentially limit the availability of construction workers and materials? Will it lead to a delay in housing delivery?

The proposed development will forever change the landscape in this area. The land where the proposed reservoir is located is flat open agricultural land. It is understood that as a bunded reservoir it could be highly visible from the nationally protected landscape of the North Wessex Downs AONB to the south and the Ridgeway National Trail. It will also be visible from the A34 road to the east and the bund will be highly visible to those living in settlements close to the proposed reservoir.

The Council has a role in civil emergency, and local residents have raised concerns about the safety of the proposed bunded reservoir. Whilst it is recognised that the Whaley Bridge Reservoir, where collapse led to local evacuation in 2019, is a different type of reservoir (dammed), assurances are needed about the design of SESRO and its safety and resilience. For example, in the event of an emergency how quickly could the water be drawn down out of the reservoir?

The proposed development will replace existing land uses including agricultural land and an existing solar farm. In terms of public access and enjoyment, it could extinguish existing Public Rights or Way, including footpaths and bridleways. More information is needed on how the project would address losses and deliver the suggested 10% biodiversity net gain. We are concerned that this type of large infrastructure project cannot be carbon neutral during its construction or during its operation.

We also have the following further concerns:

- Concern that the bunded nature of the reservoir will make access for recreation difficult,
- How it can be ensured that rail freight can be used during the construction of the reservoir and for access to the site for recreation once it is operating,
- Water quality,
- Impacts on archaeology,
- Impacts on flood risk.

Conclusion

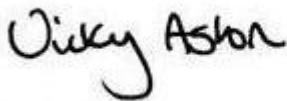
In summary, Vale of White Horse District Council has significant concerns about the proposed SESRO reservoir. As the need to tackle the climate emergency grows increasingly evident, we request that the next version of the plan excludes the reservoir. Building a new reservoir should be a last resort, later in the plan period, when all other options which have a lower carbon footprint and impact on the environment have been exhausted.

The water companies should first secure water savings through reduced pipe leakage, innovation, and reduced water consumption before any of these major infrastructure projects are taken forward.

We have also highlighted in our response to the questions below that we are concerned that the need for water in the South East may have been overestimated. This because the latest available population and development projections have not been used in the Plan's preparation.

Please could you acknowledge receipt of this letter and we trust that you will act to address these concerns.

Yours sincerely,



Vicky Aston
Planning Infrastructure Team Leader

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

Consultation questions

We have responded below to the consultation questions and references are made where appropriate to the comments in our letter, both should be given full consideration.

1. *Abstraction reduction to protect the environment is likely to be the single biggest driver of investment in water resources over the next 25 years. Do you agree with our approach to establishing the appropriate level of abstraction reduction required across South East England?*

It is important to reduce abstraction but it is not the only issue that should drive decision making in the regional plan. We seek more emphasis on the climate and ecological emergencies.

2. *We'd like to hear your views on how we prioritise where abstraction is reduced.*

No comment

3. *Are there any other factors that you think should be considered as we prioritise where abstraction could be reduced in the future?*

A holistic/multi-criteria approach should be considered to prioritise catchments where it is likely to deliver the greatest overall benefits for people and nature. Weight should also be given to prioritising catchments where it would support the ambitions of Nature Recovery Strategies (once established).

4. *We have assessed the future water needs of the other sectors that don't rely on the public water supply provided by water companies. Do you agree with our assessment?*

No comment

5. *We've described our adaptive planning approach and the scenarios we've included in our adaptive planning pathways. Do you agree that we have planned for the right scenarios in each of the pathways with a wide enough range for each of our key challenges through our adaptive planning approach?*

No, our Council does not support what is presented. As set out in our comments above, the WRSE website identifies that 1400 different options have been looked at but from all of these schemes only one set of options is put forward in this regional plan for 2025-2040. Our Council considers that insufficient justification is provided within the document as to why SESRO is required to form part of the 2025-2040 and questions why alternative solutions from the 1400 options are not being presented.

There are also other large scale regional options being looked at and researched through the RAPID process (15 strategic regional options) and none of these are

included as potential solutions to the South East's water needs for 2020-2040. The reservoir is clearly Thames Water's preferred option for meeting the needs identified, and this consultation does not invite any discussion about the other options that are available. For example, when starting a consultation on our development plan we would usually produce a range of options for consultation before presenting a preferred option. It is not clear why alternative options to the reservoir to support needs during the period 2025-2040 are not included in the consultation.

Our Council understands the need to think long term in planning for our future water needs but we do not consider that sufficient justification is being provided in the document to support the pathways set out in the document. The WRSE Plan solutions presented are not radical or forward looking and use old infrastructure solutions such as reservoirs.

We are also concerned that the amount of water estimated that is needed may be an overestimate as the most up to date forecasts of population and housing may not have been used in the planning process (please see comments set out in response to question 6 below).

6. *Do you support our approach to treat each pathway as equally likely and not choose a core pathway beyond 2040?*

We do not support the current draft WRSE Plan. We question all the pathways set out in the current consultation. However, we support an approach which is adaptable to various pathways and agree that the core path for beyond 2040 should not be set at this stage. More time is needed to review all of the strategic water resource proposals that are part of the RAPID process and further time is needed to determine future water needs, for example updating population forecasts, understanding the impact of the recent pandemic and the move to home working. The 2021 census information is also about to be published. We are concerned that the population forecast included in this document overestimate the amount of water needed.

7. *Do you have any other comments on our approach to addressing the challenges that are facing South East England?*

Yes, as set out in our covering letter section above, we consider the WRSE plan should be more ambitious by;

- investing in nature-based solutions (such as improving river catchments through establishing nature recovery areas);
- encouraging consumers (including customers) to consume less and take responsibility for their own water use sooner,
- further considering additional water recycling and desalination facilities,
- Working up solutions for water transfers and bringing them forward sooner.

Delaying these solutions to later in the WRSE plan period (for example, between 2040 and 2060) represents a missed opportunity to explore alternatives to old style solutions like the reservoir.

We consider that more and better work inter-regionally is also required to use water from other areas to service the South East, in preference to bringing forward the SESRO.

8. *Reducing the demand for water through leakage and water efficiency activity contributes to more than half of the total amount of water needed in the first 15 years of the emerging plan, the balance then shifts to include a greater reliance on supply side solutions, particularly in the more challenging future scenarios. Water companies are committed to delivering these reductions, but they are reliant on customers making sustained reductions in their water use over the long-term. Do you think our plan strikes the right balance between demand and supply solutions and the risks associated with delivery of such solutions?*

No, we do not consider that the plan strikes the right balance between demand and supply solutions. We recommend that there should be more emphasis on demand-side solutions, particularly leakage reduction.

9. *The plan assumes that the Government will introduce new policies that will support more efficient use of water across society through labelling of water-using products by 2024, introducing a minimum standard for all water using products by 2040 and tightening the water efficiency requirements within the Building Regulations for new homes by 2060. Do you support these interventions and the timing of their introduction?*

Yes, we support Government interventions that seek to reduce water use and help customers to become more aware of the amount that they consume. We support tightening water efficiency requirements for new homes within the Building Regulations but suggest that this should be achieved much sooner than 2060, even if this means a phased approach with requirements becoming more stringent over time. We suggest that setting water efficiency requirements for some types of non-residential development in the Building Regulations should also be considered (e.g. offices, schools, etc).

10. *Do you think it is appropriate for Temporary Use Bans and Non-Essential Use Bans that reduce demand for water further during droughts to be used as options in this regional plan?*

In responding to emergencies and future unexpected events, it seems reasonable to reduce the amount of non-essential water use.

11. *Do you agree with the mix of options that provide new water supplies for the region within our plan (reservoirs, desalination, water recycling, new transfers, improved abstraction from groundwater storage and ASR schemes). Do you think that some options should feature more or less in our plan to secure future water supplies?*

No, we do not agree with the mix of options that provide new water supplies. We recommend that SESRO should not feature in the plan. Options to transfer water into the region should feature more strongly.

12. *Do you support the use of new, potentially long pipelines to move water around the region?*

See above. We support moving water around the region and inter-regionally where this can be undertaken without significant harm to the environment.

13. *We have identified where water companies might investigate a number of new, more innovative nature-based solutions to improve the region's water catchments. Whilst these options can provide multiple benefits the fact they are still relatively new can make it more difficult to be certain of the benefits that will be delivered and the return on investment. Do you agree that we should promote new, more innovative nature-based solutions in our plan to develop a better understanding of their future value and role in delivering water supplies and wider environmental improvements?*

Yes, we support the use of new, more innovative nature-based solutions. Nature-based solutions have the potential to deliver a wide range of benefits for nature and people. Engagement should be undertaken with a wide range of stakeholders, including local authorities, to identify opportunities to deliver the greatest environmental gains. There may be potential to align with other projects to deliver greater benefits – for example, aligning with emerging flood risk management schemes and Nature Recovery Strategies. Partnership working will be important in seeking to implement this approach. The recent introduction of mandatory biodiversity net gain in the Environment Act means that there is the potential for funding from developments to help contribute towards schemes that support nature in river catchments.

14. *Do you support our approach to stop using the majority of Drought Orders and Permits, only continuing to use a limited number during droughts until we achieve one in 500-year drought resilience and stopping their use after 2040 unless we experience a drought more severe than a one in 500-year event?*

No comment.

15. *Overall do you agree that the emerging plan, which presents the most cost-efficient adaptive planning solution, should be used as the basis to further develop our draft best value regional plan?*

No, Vale of White Horse Council objects to this Plan and the proposal for a new reservoir near Abingdon. We recommend that significant additional work is needed before progressing this plan and that more work should explore alternatives before progressing what is set out in the document. This should include:

a. Population forecasting

All of the regional plans should use the same base population and population projections. For example, the Water Resources West website suggests that they are currently reviewing forecasts to ensure that they have the most recent data available. The data used for this plan should be further updated.

b. Adaptability of the plan up to 2040

Until all of the OFWAT schemes have been fully investigated, early decisions should not be made to progress the controversial reservoir proposal (SESRO).

Preference should be given to transferring water in from other regions, rather than reservoirs which act to store water in the river system (usually in winter) and therefore are dependent on sufficient river flows.

c. Climate impact analysis

Low carbon and least environmentally damaging solutions are needed. Carbon footprints should be a key factor in choosing between options. The carbon footprint of each infrastructure option should be set out in all of the regional plans and those solutions that produce the lowest emissions should be brought forward first. We are concerned that a large infrastructure project, like the reservoir cannot be carbon neutral during its construction or during its operation and this should be an important consideration when assessing options for the plan.

d. Nature-based solutions

As referenced above, bringing forward schemes that work with nature should be the focus of the new regional plan.

e. Future innovations

As this is a long-term plan, it should also allow for scope for future technologies to come forward toward to address potential future water shortages in lower impact ways e.g. developments in desalination plants to reduce their energy use. For example, only one desalination plant is proposed in the current regional plan up to 2040.