South East Strategic Reservoir Option – Gate 1 Summary of Customer Research

Consultation response, by Planning Oxfordshire's Environment and Transport Sustainably (POETS)

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POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

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Consultation process

1. The South East Strategic Reservoir Option (SESRO) is being jointly proposed by Affinity Water and Thames Water as part of RAPID's Gated Process. But we are concerned at the lack of publicity by the companies about this proposal. POETS has been concerned at the Democratic Deficit in many recent planning issues¹, and we fear this is another example. Not only was RAPID's original consultation period of 3 weeks too short, but it is not straightforward to find a link on RAPID's site to where comments on the Gate One proposal should be sent. We are sending these to: rapid@ofwat.gov.uk; consultations@thameswater.co.uk, and to Nick Honeyball, Programme Manager at Affinity Water for SESRO, at WRMP.Consultation@affinitywater.co.uk.

Changed circumstances demand a reassessment

- 2. The SESRO continues Thames Water's long-standing intention to construct a 150Mm³ reservoir to the south-west of Abingdon. TW's case makes clear that this will take 10 years to construct; it will primarily serve London's water demand.
- 3. SESRO is referred to as "the solution". Both Thames Water and Affinity Water concluded in their latest WRMPs that this is one solution (amongst others such as Severn-Thames Transfers) to the problems of water supply and demand, especially in the face of a changing climate. The current Gate One proposal is to progress from the WRMP to the next stage of approval by RAPID, and we acknowledge that the document therefore does not repeat the analysis of the WRMP19.
- 4. However, we consider that Affinity and Thames Water need to review the arguments for which SESRO is proposed as a (or the) solution, and the alternatives considered, given significant changes since 2019. The companies must be clear about the objectives they are trying to meet, and the different socio-economic and climate change scenarios against which the solution is assessed. POETS has three major concerns:
- 5. Firstly, the impact of the COVID-19 pandemic, especially on working and social activities, and possible consequences for growth levels and patterns of development, needs to be explicitly examined. Work on the socio-economic scenarios done already for Affinity and Thames Water's Water Resource Management Plans 19 therefore needs revisiting.
- 6. Secondly, COP 26 has shown there is more political support for urgent action to address the climate crisis; and the Natural History Museum has found that the UK is one of the most nature-depleted countries in Europe. We fully understand that climate change is having, and will have, an impact on the supply of and demand for water, and will add to pressures on biodiversity. We commend and support Affinity's actions in reducing abstraction from the Chess Valley, and its commitment to reduce water-take from the other vulnerable but globally rare chalk streams of the Chilterns. We also acknowledge that many studies have

¹ https://www.poetsplanningoxon.uk/poets-democratic-deficit-2021update-paper-150221.pdf

- already been undertaken on the environmental, hydrological, water quality and ecological impact of the reservoir. But aspects of the companies' proposed SESRO solution need challenging: for instance, the companies acknowledge that construction of SESRO involves very high embodied carbon. This must be reappraised, given the UK's commitments to reduce carbon urgently and significantly.
- 7. Thirdly, greater urgency should be given to demand-reduction and leakage reduction measures. We appreciate the fact that water companies are working together at a regional level, and acknowledge the good work being done through WRSE to share good practice. Some companies have lower consumption rates, and we believe that more can be done, especially in London, which has historically had high rates. We share the view that the South East is already a water-stressed area: growth proposals (such as the putative Oxford-Cambridge Arc) would exacerbate the problem. We realise that the Gate One submission is a Feasibility study, but we would expect it to refer to the national commitment to reduce per capita consumption to 110 lpd by 2050. We acknowledge that Thames Water's WRMP Annual Review for 2019-20 shows at Table 23 that household consumption rates in both London and SWOX are higher than expected, and that COVID-19 has raised household-consumption.