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Thursday, 21 October 2021

Dear Sir or Madam

RAPID gated process Representation to draft decisions at gate one

These comments are made on behalf of our Council in response to the invitation to make representations on the gate one draft decisions document published on 14th September 2021. The draft decision is that all schemes submitted should pass through to 'Gate 2'. The 'Standard Gate One Themes and Assessment Overview' explains that *'we expect solutions to progress unless they are shown not to be viable or there is another showstopper, which cannot be mitigated'*.

Our Council supports the need to develop long term solutions to plan for our future water needs. However, we are concerned that this process appears to only support the development and funding of those solutions that the water companies choose to progress. There may be preferable alternative solutions to the opportunities identified by the water companies but the gated process that has been set out does not appear to allow or encourage groupings of smaller scale alternatives to be put forward or encouraged to meet our water needs.

The first key theme of our Corporate Plan is to 'protect and restore our natural world'. Our Council is concerned about what the potential environmental impact of the proposed River Severn to River Thames pipeline project (Severn to Thames Transfer Strategic Regional Option) could be on the River Thames and its associated watercourses, which run through our district. The Draft Decision on the Severn to Thames transfer records on page 8;

'We consider that the progress and quality of the work presented in the gate one submission in this area was satisfactory, however the submission fell short of expectations in some areas. This includes the extent of evidence in environmental assessments to understand environmental impacts and risks, and extent of monitoring plans to address this understanding.'

In particular, the gate one submission does not reflect the challenges and risks the solution faces with regard to compliance with the Habitats Regulations, as there is insufficient evidence at this stage to conclude no significant impact on the integrity of the Severn Estuary Special Area of Conservation (SAC) and its linked habitat.'

This indicates that there could be a significant environmental impact, from this project. It is also not clear whether it is possible for this solution to achieve net biodiversity gain. Yet it is noted that this project has been allowed to proceed to the next gate. Due to these potential environmental impacts and risks, it could be more appropriate for the regulator to require additional information from the water companies before progressing this solution to the next gate.

Our Council is also very concerned about the Climate Emergency and the third key theme of our Corporate Plan (2020-24) is 'Action on the Climate emergency'. In contrast, we observe that this gated process appears to give very limited consideration of the impact from these proposed solutions on climate change. For example, it is understood that the proposed Severn to Thames pipeline may involve pumping water uphill which can require significant amounts of energy. The carbon footprint of all the proposed schemes should be assessed and made public.

As the need to tackle the climate emergency grows increasingly evident, it is recommended that this gated process is urgently reviewed to ensure that alternative options are encouraged to come forward that have a lower carbon footprint and less impact on the environment.

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,

