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Monday, 14 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.

Our Council's priorities, set out in our Corporate Plan, place the climate emergency and the natural world centre stage. We would prefer to see smaller projects and nature focussed solutions for storing water, rather than strategic-scale water supply construction projects. We would also encourage water companies to fix leaks and reduce waste in the existing network to reduce the need for major new strategic solutions.

The first key theme of our Corporate Plan is to 'protect and restore our natural world'. Our Council is concerned about the potential impact of some of the strategic options proposed in the plan on the natural world. Large scale infrastructure projects are energy, materials and resource hungry. They bring direct environmental impacts on landscapes and ecosystems, and unintended consequences for the natural world. For example, the River Thames and its associated watercourses runs through our district, and the proposed River Severn to River Thames pipeline project (Severn to Thames Transfer Strategic Regional Option) could, we understand, have significant environmental impacts, like the risk of invasive species.

For any of the options, particularly any impacting on our district or our neighbours, we would want to see clear proposals to deliver biodiversity net gain. Given its scale and impact on the existing and surrounding environment, it may be a challenge for the proposed South East Strategic Reservoir Option (SESRO - in the Vale of White Horse District next to ours) to achieve biodiversity net gain. Our Council is concerned that these large projects, Severn to Thames Transfer Strategic Regional Option and SESRO, have been included as significant parts of the plan when the environmental impacts and risks have not been fully tested.

Our Council is very concerned about the Climate Emergency, the third key theme of our Corporate Plan (2020-24) is 'Action on the Climate emergency'. In contrast, we observe that the WRSE document appears to give very limited consideration of the impact on climate change from some of the proposed solutions. For example, the proposed Severn to Thames pipeline may involve pumping water uphill, requiring significant amounts of energy. The proposed SESRO reservoir is also likely to have a very significant carbon footprint during construction and operation. The carbon footprint of all the proposed schemes should be assessed and made public.

Our Council is therefore very concerned that as the need to tackle the climate emergency grows increasingly evident, we request that this plan is reviewed and prioritises those solutions that have a minimal carbon footprint and low impact on the environment. The large infrastructure solutions in the plan 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.

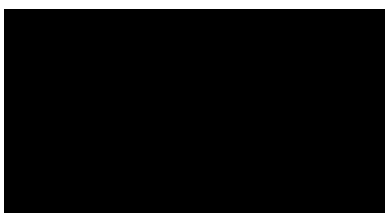
The water companies should first secure water savings through reduced pipe leakage, innovation, and reduced water consumption before any of these major infrastructure projects are taken forward.

Furthermore, 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.

We recommend that the WRSE 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,



Planning Infrastructure Team Leader

## 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 from the chalk aquifer to help restore the flow levels of chalk streams and achieve the condition required by the Water Framework Directive. A large proportion of the Chilterns Area of Outstanding Natural Beauty falls within South Oxfordshire, and Ewelme Brook in South Oxfordshire is a Chilterns chalk stream. However, we feel the water companies should seek to achieve this for chalk streams (such as those in the Chilterns AONB) much more quickly than is set out in the plan, by using more rapid solutions than major infrastructure projects.

Achieving abstraction reduction is not the only issue that should drive decision making in the regional plan. We seek more emphasis on addressing the climate and ecological emergencies through a range of lower impact solutions, rather than major infrastructure projects such as reservoirs, pipelines and desalination plants.

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

Our Council is particularly concerned about protecting our rare chalk streams from abstraction, including those in the Chilterns AONB. We seek more information on where and when the benefits of reducing abstraction would be felt, so we can assess how and when chalk streams in our part of the Chilterns AONB would benefit.

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 the set of options in the consultation has been chosen for 2025-2040 and questions why alternative solutions from the 1400 options are not being presented.

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 SESRO reservoir to support needs during the period 2025-2040 are not included in the consultation.

We understand the desire 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 advise that the next draft of the Plan should focus on those solutions that address the climate and ecological emergencies through a range of lower impact solutions, rather than major infrastructure projects such as reservoirs, pipelines and desalination plants that may have a significant environment and ecological impact.

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 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 forecasts 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, 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 lower impact solutions like those above to later in the WRSE plan period represents a missed opportunity to explore alternatives to old style solutions like reservoirs.

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 consider that the focus should be on reducing customer use and fixing leaks.

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

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

concerned about the risk to the River Thames and other waterbodies from transferring water from the River Severn catchment, including biodiversity risks (invasive and non-local species), and a different water chemistry.

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, South Oxfordshire District Council does not support this plan. 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 schemes that significantly damage the environment/have a significant carbon footprint.

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. 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.