

Policy & Programmes

HEAD OF SERVICE: Harry Barrington-Mountford



By email: Contact@wrse.org.uk

CONTACT OFFICER: [REDACTED]

planning.policy@southoxon.gov.uk

Tel: 01235 422422

Textphone: 18001 01235 422422

Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

20 February 2023

Dear Sir or Madam

WRSE - Futureproofing our water supplies – A consultation on our draft Best Value Regional Plan for South East England

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

As set out in our response to the previous WRSE consultation in March 2022, our Council's priorities, set out in our Corporate Plan, place the climate emergency and the natural world centre stage. In the draft Best Value Regional Plan, we would prefer to see smaller projects and nature focussed solutions for storing water, rather than strategic-scale water supply construction projects.

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. It is of concern that this proposed plan relies heavily on large scale Nationally Significant Infrastructure Projects, such as the water transfers and large reservoirs, which could have a significant environmental impact.

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.

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.

We recommend that the WRSE Plan is amended to prioritise options that have a lower carbon footprint and less impact on the environment.

We have responded below to the consultation questions;

Consultation questions

Q1) Our draft regional plan looks 50 years ahead. It plans to increase resilience to drought and address the potential shortfall in water as a result of climate change, population growth and increased protection of the environment, by taking an adaptive planning approach. Do you think the draft regional plan addresses the scale of the challenge we face in the future through our adaptive planning approach?

Strongly disagree

The draft WRSE regional plan acknowledges the scale of the challenge we face but the solutions it presents to the challenge are not the right ones to address it.

We are facing a climate emergency. Our Council is committed to doing everything we can to help tackle the Climate Emergency. As set out in the [South Oxfordshire Corporate Plan 2020-2024](#) our climate targets are to be a carbon neutral council by 2024 and a carbon neutral district by 2030.

The solutions proposed by the water companies to tackle the climate emergency should not include strategic solutions that have a large carbon footprint like the proposed reservoir near Abingdon (SESRO) and would severely impact the local environment in which it would be located. Our Council is very concerned that it is proposed to complete the South East Strategic Reservoir Option (SESRO) near Abingdon, Oxfordshire by 2040 in all scenarios. This decision is being made without proper consideration of its carbon footprint. It is clear from the information provided in the [SESRO Carbon Report](#) that this reservoir will result in significant carbon emissions. The report refers to Thames Water carrying out work to investigate mitigation for the carbon emissions. For example, low carbon fuels for construction vehicles or low carbon earth

moving equipment. However, these technologies are not widely available yet. It is not clear why this scheme that will result in major carbon emissions is being prioritised over smaller, less environmentally destructive projects.

The Plan refers to *'catchment and nature-based schemes that improve the water sources we rely upon'* but the draft WRSE Plan does not appear to provide any detailed schemes or timeframe for bringing these schemes forward, despite identifying 200 potential catchment and nature-based schemes (see page 35).

Our Council considers that the best value criteria need to be re-evaluated to better consider the environmental impact and carbon emissions associated with the projects in the WRSE plan. Alternatives such as bringing forward water transfers, making more progress with addressing water efficiency, fixing leaks and prioritising schemes for recycling water or desalination. More schemes that seek to provide water closer to where it is needed should be prioritised.

As highlighted in our March 2022 response, there are over-estimates in the number of customers projected for the region, based on the population data and population growth forecasts. This information should all be updated to reflect the more accurate information provided by the ONS 2021 Census.

Q2) Our draft regional plan has considered the needs of other sectors and how their demand for water could be met in the future.

Do you support us continuing to work with other sectors so our regional plan fully embeds their future needs and includes appropriately-funded solutions to meet them?

Disagree.

WRSE should work with other sectors to recognise their current and future water needs. However, these sectors may not require water of drinking water quality. The water companies and the Government should work with other sectors to ensure that those who require water are doing all they can to reuse and recycle water within their sites using the technology available. The solution to meeting future water requirements of all users should come firstly through the reuse and recycling of water by all users, not Nationally Significant Infrastructure Projects schemes that could have a harmful impact on our climate and environment.

Q3) The draft best value regional plan includes investment in new water supplies and activity to reduce the demand for water. The draft plan identifies that nearly 60% of the water needed by 2075 could come from demand management activities. This includes reducing leakage by at least 50%; extensive water efficiency through smart metering, customer behaviour change and new government policy; and the continued use of temporary restrictions on water use during periods of drought. The rest needs to come from a mix of new supplies. Do you think the draft regional plan strikes the

right balance between reducing demand for water and developing schemes to provide new water supplies?

Strongly disagree

No, the plan does not strike the right balance between reducing demand for water and development schemes to provide new water supplies. The plan should prioritise other options such as water recycling close to where it is needed before supporting major strategic infrastructure projects.

More should also be done by the Government (working with Local Government) and the water companies to look to reducing demand for water. Whilst the water companies' new draft Water Resource Management Plans do more to address how we reduce water usage in our homes than the previous WRMPs, they could go much further.

The energy crisis and increase in costs has made many of us think more carefully about how we use energy in our homes. The water companies and Government should consider whether more could be done to encourage us to reduce our water consumption. For example, incentives could be introduced to have a smart meter, and to encourage customers to harvest rainwater and store water for gardening and non-drinking water uses like flushing WCs. We would like to see new housing include provision for storing water, for example in gardens or underground. If measures like these were implemented now this could greatly reduce consumption and the need for large strategic infrastructure schemes.

We are concerned that the plan has been based on figures for water use per capita that are not ambitious enough: 115 litres per person by day by 2050. If this was significantly lower and introduced sooner, this would reduce the need for new strategic solutions to meet demand. In January 2023 the Government launched the Environmental Improvement Plan, containing new water efficiency standards of a baseline of 105 l/p/d, with a higher standard of 100l/p/d where there is a local need. The WRSE Plan should now be revised to take this into account. As a local planning authority, we are willing to help Government and the water companies explore this in our district through our next local plan.

We are concerned (see page 27) that the draft regional plan assumes that Government will delay bringing in new building regulations as late as 2040 (or possibly even as late as 2060). We would anticipate new standards coming forward much sooner. By using these assumptions, the WRSE Plan over estimates the amount of water that will be needed.

The water companies should also be challenged to do more to fix leaks. Our Council considers that not enough is being done to replace pipes and identify leaks. The WRSE plan should set out bolder plans for finding solutions. We consider that temporary restrictions or 'hosepipe bans' can be justified when water demand is at its highest.

Q4) The draft best value regional plan promotes increased collaboration between water companies in the development of new water sources and the construction of more transfers to move water around the region and share it between companies

Do you support the increased collaboration between the water companies in the South East and other regions, through the development of shared resources and an enhanced network to transfer water around the region and between regions?

Agree

We support increased collaboration between the water companies in the South East and other regions but more work is needed to establish how the proposed water transfers could work in practice.

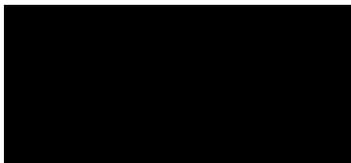
Our Council considers that the water companies' collaboration should not be limited to developing new strategic infrastructure projects. Instead, the water companies should work together to share best practice on how to reduce water demand and fix leaks. The water companies should support Government with updating the building regulations.

Our Council is concerned about the impact of the potential transfer pipeline proposed from Thames Water to Southern Water. This will route through an Area of Outstanding Natural Beauty and it is not clear at present if this scheme is needed. It could be more appropriate for further water recycling schemes and a desalination plant to instead be developed closer to where water is needed.

Finally, page 35 of the document refers to *'catchment and nature-based schemes that improve the water sources we rely upon'*. The draft WRSE Plan does not list any of these schemes or provide a timeframe for their delivery, despite identifying 200 potential catchment and nature-based schemes in the emerging regional plan. This is very disappointing. These schemes could deliver multiple benefits. It is a missed opportunity that no schemes are included in the document and instead the water company focus is only on large water strategic resource infrastructure schemes. This is not the case with other regional water resources documents, which do include nature-based solutions at scale to address water-related challenges. In the South-East where there is a greater need for water, WRSE should be identifying these types of schemes to come forward.

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
South Oxfordshire District Council**