

Policy & Programmes

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Dear Sir or Madam

The RAPID gated process and the proposed water resource solutions – Gate 2 consultation

South Oxfordshire District Council is responding to this consultation as there are 3 water resources schemes located in or close to our district. These are:

- SESRO
- Severn to Thames Water Transfer
- Thames to Southern Water Transfer

Our Council is concerned that all the schemes put forward to RAPID are moving through to stage 3. We had understood that some schemes would fall away at Gate 2, but there appears to have been no shortlisting, which calls into question the value of the gated process. It means that public money is potentially being wasted on continuing to develop schemes that should fall out and not receive further financial support.

It is not clear what the process will be after this Gate. The diagram shown on the RAPID website now shows no clear end dates for Gate 3 or Gate 4 for the schemes under consideration. When the process was first developed, all schemes followed the same process that was clearly set out, but this is now being changed without explanation.

We further note that more money continues to be given to some projects rather than others. The RAPID website states:

'The decisions at gate two are made by further examining the solutions in more detail, with focus on ensuring that funding for continued investigation and development of solutions is aligned to water resources planning. We welcome representations from stakeholders regarding these elements.'

Decisions about whether or not a solution goes ahead will be made through water resources planning and subsequently applications for local planning and environmental consents, not the through RAPID itself.'

This latter statement suggests that RAPID takes no responsibility for the decisions that are being made about which schemes are advanced. By providing more funding and support to certain schemes, those schemes, usually those that are more advanced by the water companies (such as Thames Water's SESRO) will have an unfair advantage and progress quicker than others under consideration. The lack of clarity about the timescale for the next gate is therefore a concern, as those schemes which are joint projects are more likely to fall behind and be dropped. For example, there appears to be a new decision point added for the Severn to Thames Transfer project (where funding might potentially be withdrawn) but this is not the case for other schemes such as SESRO.

We are concerned that schemes like strategic reservoirs continue to be the preferred option for meeting our water needs. Projects as large as the SESRO are environmentally damaging and ramp up our district's carbon emissions as well as those for the wider south-east. It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (Climate Change Act 2008). This won't be achievable if the Government persists with supporting schemes like the SESRO that increase carbon emissions.

Instead of RAPID funding large strategic schemes (like SESRO), we would instead like to see RAPID instead funding a wider range of nature-based catchment management schemes. Such projects would ensure more water can be retained in the system whilst also managing flood risk and creating new nature reserves. These schemes can benefit nature and people and can most effectively be brought forward by working with local authorities. Instead, construction of major infrastructure schemes being supported with public money by RAPID will further contribute to the climate emergency through adding significant additional carbon emissions, damage the environment and landscape, and are likely to meet with significant opposition from local communities, who do not get to share in the benefits from the schemes that the solution owners (water companies) will benefit from.

Whilst these are Nationally Significant Infrastructure Projects (NSIPs), we ask that RAPID includes more in its Gate 2 decision letter to encourage the water companies to act on advice from the local planning authority and the highways authority on scheme development. There is more information on the Planning Inspectorate's website that explains the vital role local planning authorities have in contributing to the NSIP process, which you can find [here](https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/)¹.

Whilst national bodies such as Historic England, Natural England and the Environment Agency etc. are able to assist with scheme development, unlike councils, they do not

¹ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

have local knowledge on the ground or democratically-elected representatives who can help identify issues and suggest mitigation measures for what could potentially be very significant impacts upon the environment, people and places where these schemes are located. We consider that RAPID should include requirements to consult the affected and neighbouring local authorities in its advice to the water companies, as this will be a requirement of the NSIP process.

More detailed comments on each of the schemes located in or close to our districts are below.

SESRO

Our Council objects to the progression of the SESRO scheme to the next gate. We further object to funding being given to a major construction scheme that is unpopular with the public and will contribute further to climate change, with its associated carbon emissions.

South Oxfordshire District Council is currently progressing a Joint Local Plan with our neighbouring district, the Vale of White Horse, where the SESRO project is located. The proposals for SESRO are not providing appropriate mitigation for local communities. Proposals should include more significant opportunities for sport, leisure and recreation, green infrastructure, transport improvements and increased flood resilience to assist the wide area over which impacts will fall, including Didcot Garden Town. The scheme of benefits provided with the SESRO should be informed by consultation with those living closest to the reservoir. As a public body and regulator, RAPID should make this clear in the RAPID decision letter.

River Severn to River Thames Water Transfer (STT)

The Severn to Thames Transfer (STT) project scheme is being allocated much less funding overall (£83.62m) than the SESRO scheme (£121.72m). This is not equitable and could be considered as indicating a preference for the SESRO scheme over this one.

Thames to Southern Water Transfer

Our council is very concerned about the potential route of this pipeline that could pass through or near to our district. It is currently being suggested that the pipeline will need to go through the North Wessex Downs Area of Outstanding Natural Beauty which is of concern as because of negative impacts on the AONB. It is important that any route planning minimises adverse impacts and that trenchless techniques are used where possible.

We do not consider that there is currently a case for advancing this scheme at the current time. This is because the proposal is dependent upon either the SESRO or the

Severn to Thames Water Transfer coming forward, there is not a clear case for this scheme progressing to Gate 3 at this time.

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,

[Redacted signature]

[Redacted name]

**Planning Infrastructure Team Leader
South Oxfordshire District Council**