Appendix 6: Angling Trust

1. Angling Trust		
1.1	Representation	**1. Our Plan allows us to adapt to these uncertainties and deliver solutions.** We are proposing an approach that focuses on reducing demand for water and developing long-term strategic regional water supply options where we would jointly build a new reservoir with a neighbouring water company and transfer water using a canal. **1. Do you agree?** Yes **Reason for choice:** Water resources in the south east of England are already under immense pressure, and forecasts of population growth and climate change predict a growing deficit in the years ahead. The Angling Trust supports the twin-track approach proposed by Affinity Water to tackle our water resource challenges of developing new water resource storage infrastructure while simultaneously ramping up efforts to reduce demand. We are very pleased to hear that Affinity is supporting the development of the South East Strategic Reservoir, which we believe to be absolutely vital in order to tackle the extreme water resource challenges faced by southern England. However, we have major concerns about the proposed timing of the development of new water resource infrastructure. A number of England's precious chalkstreams – a globally rare and unique type of ecosystem – lie within Affinity Water's supply area and many of these are suffering from severe over-abstraction. While there have been some significant sustainability reductions by Affinity Water in recent years, there is an awful long way to go to reach truly sustainable levels of abstraction. We can see no possible way of such reductions being achieved in the absence of significant new sources of supply, and with no major new infrastructure planned until the late 2030s (at the earliest) we fear that our rivers will continue to suffer in the interim. We also have concerns about the large-scale transfer of raw water from the lower River Severn to the upper River Thames via the Oxford Canal. The water of the lower Severn will possess radically different properties than that of the upper Thames, with notably higher sediment and nutrient loadings, and we believe that the import of such water may have impacts on the River Thames. The large-scale transfer of raw water also has the potential to quickly move around (eggs and larvae of) invasive species, and we have reservations about the levels of drought resilience offered by the transfer option – given the likelihood of both the Severn and Thames catchments being in drought conditions simultaneously. Consequently, our preferred major new resource option is the South East Strategic Reservoir and we believe that this should be brought on-line as quickly as possible.
	Our Response	**We welcome your positive representation.** **The timing of our first strategic option has been carefully considered and determined according to our decision-making methodology. The results of that modelling in terms of the timing of options are summarised in section 7.2.4 of the main SoR document and in Technical Report 4.9** **As described under section 10.2.4 of the SoR, we will be carrying out detailed water quality and environmental investigations on transfer schemes prior to 2023 and before we commit to development of a scheme.**
	Summary of any change to our final WRMP	An update regarding decision making is provided in Chapter 5 of the fWRMP19 and Technical Report 4.9.
1.2	Representation	**2. Leakage** We are committed to reducing leakage. In 2015, leakage was around 21% (189 million litres of water per day) of the water we put into supply. By 2025 we will have reduced this down to 15%.

1. Angling Trust		
		In our Plan, we aim to reduce leakage to between 11% and 13% of water we put into supply by 2045, provided we can do it in an affordable way for customers. This would be a reduction of nearly 50% since 2015. **2. Do you agree?** Yes **Reason for choice:** We believe that cost-effective leakage reduction represents a vital component of the suite of options proposed by Affinity to tackle the growing water resource deficit. Reducing leakage is important for the environment as it should ultimately reduce what is abstracted from the chalk aquifer, making more water available for our chalk streams. Ensuring that Affinity is visibly doing all it can to reduce leakage is also vital from a public relations point of view: to increase the likelihood of getting public buy-in for demand management approaches, Affinity must be seen to be successfully tackling leakage.
	Our Response	**We welcome your positive representation.** **We fully support the ambitions to substantially reduce leakage by 2050. Our initial aim is to achieve a 50% reduction in leakage between 2015 to 2045. This 30-year programme to reduce leakage by 50% is planned to deliver five years earlier than most other water companies because we started the process in 2015, and will already have delivered a 14% reduction by 2020, followed by a further 18.5% reduction between 2020 and 2025. We will then aspire to achieve a higher level of reduction, to 57% from the 2015 position, which will allow us to reduce leakage by 50% from our 2020 position.** **Clarification of the 50% target and the ambition for 50% post AMP7 (i.e. 57% overall) is included in the fWRMP19 along with clarification of how we have handled mains renewals for leakage and trunk mains schemes. Explanation of how we will achieve leakage efficiencies and details of our leakage reduction strategy are provided in Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.**
	Summary of any change to our final WRMP	An update regarding leakage is provided in Chapter 6 and Technical Report 4.8: Leakage Strategy Report in the fWRMP19.
1.3	Representation	**3. Options to increase the supply of water** To ensure there is enough water available for future generations and be better prepared to cope with drought, our Plan is proposing two new supply options – a reservoir and a transfer of water via a canal. **3 a)** We are proposing to construct a new storage reservoir in Oxfordshire, called the South East Strategic Reservoir, in partnership with Thames Water. The River Thames will be used to transfer water into the area we serve. This will provide an extra 100 million litres of water per day by the late 2030s. **3a. Do you agree?** Yes **Reason for choice:** *The Angling Trust believes that the South East Strategic Reservoir (SESR) represents the only reliable new resource option that can meet the forecast water supply shortfall (in the face of ongoing population growth and increasingly variable weather as a result of climate change) while relieving the existing pressure on our chalkstreams. We firmly believe that this project should be accelerated with delivery targeted before 2030, rather than delayed until well into the 2040s. The project has previously suffered delays for a variety of reasons, including a lack of national support and issues with the local planning process, and the primary victim of these delays has been our chalk streams. They have suffered further decades of over-abstraction because there simply hasn't been an alternative resource upon which Affinity Water (and other south east water companies) can fall back. The SESR will offer that fallback resource to enable major abstraction reductions from pressured rivers in the Home Counties.* *The introduction of the National Policy Statement for Water Resources by the Government earlier this year has paved the way for major new nationally significant water resources infrastructure projects (NSIPs) and consequently we see no reason to delay*

1. Angling Trust		
		further the construction of the reservoir. To do so unnecessarily would be to fail our chalk streams.
	Our Response	**We welcome your positive representation.** **The timing of our first strategic option has been carefully considered and determined according to our decision-making methodology. The results of that modelling are provided in section 7.2.4 of the main SoR document.**
	Summary of any change to our final WRMP	An update regarding decision making provided in Chapter 5 of the fWRMP19 and Technical Report 4.9
1.4	Representation	**3 b)** We will continue to investigate the potential to transfer treated wastewater via the Grand Union Canal. This would bring water to the area we serve from near Birmingham, where there is a surplus of water available. This could provide an additional 50 million litres of water per day to customers either in the longer term or as an alternative to the reservoir development. **3b Do you agree?** Yes **Reason for choice:** *We would support this proposal but not as an alternative to the development of the reservoir. In principal, we take no issue with the transfer of treated wastewater from the Birmingham area, provided that it doesn't result in any deterioration of river ecology.*
	Our Response	**We welcome your positive representation.** **As described under section 10.2.4 of the SoR, we will be carrying out detailed water quality and environmental investigations on the GUC transfer scheme prior to 2023 and before we commit to development of the scheme.**
	Summary of any change to our final WRMP	N/A
1.5	Representation	**4. Reducing the amount of water used by each person per day** We have committed to support customers to reduce the amount of water they use each day from the current average of 152 litres per person per day to 129 litres by the end of 2025. In our Plan, we are aiming to reduce this to between 110 and 120 litres per person per day by 2045, but only if this is affordable for customers and delivered in a way acceptable to them. **4. Do you agree?** Yes **Reason for choice:** *We agree with efforts to reduce demand and believe that this represents another vital component to meeting future water resource challenges.*
	Our Response	**We welcome your positive representation.**
	Summary of any change to our final WRMP	An update regarding or demand management strategy is provided in Chapter 6 of the fWRMP19.
1.6	Representation	**5. Cost of our Plan** Delivering our Plan will mean a rise in customer bills from the 2018 annual average of £171.70 to £193.70 in 2080. This is an increase of 37 pence per year. This figure does not include inflation or wastewater (sewerage) bills. **5. Is this proposal acceptable?** *No

1. Angling Trust		
		Reason for choice: *We firmly support an increase in customer bills and believe that for far too long water has been too cheap. In order to reduce consumption and to encourage customers to value water more highly, it must increase in price. However, we believe the proposed increase to be far too low. Indeed, under the current circumstances where our river environments* have *steadily degraded due to a lack of investment in sustainable water resources infrastructure, we believe that it would be highly irresponsible to maintain the existing regime of low water prices.*
	Our Response	**The price of water is set by the Ofwat determination process.**
	Summary of any change to our final WRMP	An update regarding how customers have shaped our plan is provided in Chapter 2 of the fWRMP19.
1.7	Representation	**Do you have any other comments you would like us to consider?** **Comments:** *Due to the fact that Affinity use more than 60% groundwater to supply its customers, you directly compete for your water with the environment. We need to urgently find alternative sources of water and reduce this dependence on groundwater from the chalk aquifer and your new strategic reservoir with Thames Water will go some way to achieve this - but only by 2037.* *Finally, we note that in your revised plan 6 Ml/d is allocated for during the construction phase of the project. This is a significant volume of water and we would like to ask where this water will be sourced and how will it be disposed of/treated?*
	Our Response	**The timing of our first strategic option has been carefully considered and determined according to our decision-making methodology. The results of that modelling are provided in section 7.2.4 of the main SoR document.** **The water demand for High Speed 2 (HS2) is considered temporary in nature (i.e. within AMP7), hence is dealt with outside of the WRMP and will be developed separately by HS2. All necessary provisions will be in place to ensure that our assets are protected from HS2 works during construction and are designed to cover peak demand periods. Moreover, a long-term monitoring plan will be in place to measure any deviation from the current baseline in terms of both source yield and water quality. Any additional infrastructure required to enhance resilience during the HS2 works, will be funded by HS2 directly.**
	Summary of any change to our final WRMP	Information regarding HS2 is provided in Chapter 3 of the fWRMP19.