Appendix 7: Ardington and Lockinge Parish Council

1. Ardington and Lockinge Parish Council		
1.1	Representation	We wish to register our strong objections to Affinity Water's revised draft Water Resources Management Plan, which is badly thought out, lacks ambition and is unfair to customers. The reasons for our objections are as follows:
	Our Response	**Our responses are detailed below.**
	Summary of any change to our final WRMP	N/A
1.2	Representation	1. Plans to tackle leakage are below the target set by the water regulator and Affinity should bring leakage down to the industry average by 2050.
	Our Response	**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	Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.
1.3	Representation	2. Similarly, targets to reduce individual consumption lag behind the best in the industry by a significant margin.
	Our Response	**We will reduce PCC to 129 litres per head per day (l/h/d) by 2025 through the continuation of our existing Water Saving Programme and employing new demand management options (this is the largest PCC reduction in the industry for this period). Significant additional explanation and quantification has been added to Chapter 6 of the fWRMP19 to demonstrate how we will meet the 129 l/h/d AMP7 target and the strategy beyond that.** **We anticipate 80%-meter penetration by 2025 and 90% meter penetration by 2045. We recognise this represents a lower target than at the dWRMP19. This is largely as a result of the higher than anticipated need to install internal rather than external meters, and taking on board experience to date around the practicalities of installing meters internally as well as wider industry learning. An explanation of the reasons for, and very limited implications of, the slower rate of metering as part of the Water Saving Programme are included, along with justification of the approach to smart metering rollout in Chapter 6.2 Our demand management strategy in the fWRMP19.**
	Summary of any change to our final WRMP	Updated Chapter 6 in the fWRMP19.

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1.4	Representation	3. In terms of future demand, the population forecasts are unrealistic when compared to historical growth rates and inflate anticipated demand. This means that money that could be spent fixing leaks and better managing the existing supply is instead spent on expensive projects that may never be needed. This raises customers' bills and saddles future generations with unfair repayment costs.
	Our Response	**We have followed required best practice and planned for growth as per Local Authority plans. Where we have made adjustments due to differences in baseline population and properties and the management of blocks of flats in the forecast, we have clarified this in our plan and technical reports.** **We recognise that high growth is only within the draft GLA plan, so this is not included in the forecast of baseline demand. Our fWRMP addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing. In the event of a "high-growth" scenario being realised we will rely on some of the less environmentally-damaging drought permits and will accelerate delivery of our first supply option to 2032. We would need a second strategic option by 2042 and a third strategic option within the 2080 time horizon.** **Additional growth from the CaMkOx development corridor has not been explicitly included as no planning figures are available at the moment but we will continue to review our forecasts as new information becomes available as reflected in our adaptive plan.**
	Summary of any change to our final WRMP	Our fWRMP19 addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing.
1.5	Representation	4. The future reservoir option at Abingdon is particularly badly thought out. Thames Water and Affinity have sought support for this by pushing the idea that it is needed to reduce abstraction rates from over-stressed chalk stream and rivers. Understandably, this has attracted much attention from the river protection and angling lobbies. However, it is clear from this draft plan that Affinity expects to meet the need to reduce abstractions by using water from the existing Grafham reservoir (not a future Abingdon Reservoir) and that this will be achieved by 2025, before the reservoir is even started. In other words it is disingenuous to seek support for Abingdon based on the above idea.
	Our Response	**This is clearly presented within our fWRMP19 in relation to the AMP7 WINEP sustainability reductions. Sustainability reductions beyond this may, however, require acceleration of the delivery of strategic options, as described under our amended adaptive plan in Chapter 6 of the fWRMP19.**
	Summary of any change to our final WRMP	Amended adaptive plan in Chapter 6 of the fWRMP19.
1.6	Representation	5. Affinity's plan to purchase water from Thames Water is, in its current form, an incredibly bad deal for Affinity customers. We understand that for every 100 mega-litres per day of water transferred, 70 or more will be returned to Thames Water since they deal with Affinity's waste water and sewage. Instead of paying for just 30 mega-litres per day, customers will pay the full price for 100 and then pay a further bill to Thames Water to process the 70 mega-litres per day they are getting for free as waste water.
	Our Response	***Charging and payment for wastewater.*** **The wastewater charge paid by customers, once metered, is entirely independent of the source of water and relates to their consumption, and does not include any costs associated with spare supply capacity that is generated in our Plan. Our investment plan is designed to help customers reduce their consumption and may therefore help to lower wastewater bills, although we note that wastewater is driven primarily by load rather than volume, so the effect is likely to be marginal.**
	Summary of any change to our final WRMP	N/A

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1.7	Representation	6. Similarly, water transferred from Grafham and the increased chalk stream flows, will largely end up available to Thames Water for free. This is not recognised in either the Affinity or Thames Water plans. Even using Affinity's own inflated figures, a source such as the reservoir is not needed until 2050. Recalculating demand and supply using sensible figures shows it is not needed in the 60-year horizon of this plan.
	Our Response	**See response to 1.6 above.**
	Summary of any change to our final WRMP	N/A
1.8	Representation	7. The Supply 2040 scheme is a good idea, but again badly implemented. Simply bringing this forward would open up a range of alternative supply options, including redistribution of surplus water available in some zones. This measure alone would mean a source the size of the Abingdon reservoir is not needed
	Our Response	**We have included details of the timing and inclusion of schemes from our "Supply 2040" strategy in the fWRMP19, and shown how it affects individual WRZ supply-demand balances under all of our modelled futures within our Technical Report 4.9: Economics of Balancing Supply and Demand Modelling and Decision Making Process.** **In summary, all of the proposed AMP7 developments, which are detailed in our Business Plan, are required to support the transfer of 17Ml/d out of WRZ6 into WRZ4, or to enable the Grafham transfer enhancement. AMP8 (2025 to 2030) then contains our second stage transfer from WRZ6 to WRZ4, and finally we have a scheme to transfer water from WRZ1 to WRZ3 in the longer term. This is now more fully described in the main Plan document.** **Our Plan incorporates the individual elements of "Supply 2040" as early as they are needed to ensure that surpluses within individual WRZs are usefully transferred into other WRZs in the Central Region. The fWRMP19 supports the requirement to distribute water to areas of need, avoiding strategic deficits and surpluses. We will continue to plan investment as quickly as is necessary to avoid water deficits and surpluses, which will also avoid building strategic schemes earlier or later than is necessary.** **We have updated Technical Report 4.9: Economics of Balancing Supply and Demand Modelling and Decision-Making Process to include the most up to date assessment of our supply demand balance for each future which supports the timing of the requirement for the transfers. The individual balances within each WRZ for each future are provided as graphs within the technical report.**
	Summary of any change to our final WRMP	Updated Chapter 6 in fWRMP19 and Technical Report 4.9: Economics of Balancing Supply and Demand Modelling and Decision Making Process.
1.9	Representation	8. Despite being co-proponents of the Abingdon reservoir, it is clear that Affinity knows little about it. They have made no attempt to engage with the local communities or councils and have no understanding of the environmental effects, the problems of building over a floodplain or even its potential lack of sustainability.
	Our Response	**As residents in the Oxfordshire area are not our customers we did not engage with them directly.** **We met with Oxfordshire County Council and the Vale of the White Horse District Council and the Group Against Reservoir Development (GARD), on two occasions, to hear and discuss their concerns directly.** **The further consultation was open to all stakeholders and we received written representations from the following:**

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		• **Oxfordshire County Council** • **Vale of the White Horse District Council** • **GARD.** • **Ardington and Lockinge Parish Council** • **East Hanney Parish Council** • **Garford Parish Meeting** • **Green Corridor Group** • **Group Against Reservoir Development (GARD)** • **125 Individuals from the Oxfordshire area** • **Steventon Parish Council** • **Wantage and Grove Campaign Group** • **West Hanney Parish Council** **Our further consultation online survey received 43 responses from the Oxfordshire area.** **Representatives from GARD and East Hendred Parish Council attended our Stakeholder Assembly.** **All the above representations and responses have been considered in the development of our final Plan and addressed in our Statement of Response.** **A number of comprehensive flood risk studies regarding the SESR are available. A review of flooding and the provisions made to mitigate effects on flood risk due to the SESR has been undertaken, available in Thames Water's Statement of Response No.2 Technical Appendix K. We have reviewed this and concur with the recommendations for further work, and also note that a Flood Risk Assessment for the SESR will be required to support the Development Consent Order (DCO).** **We have addressed the points raised across the various representations which relate to the Strategic Environmental Assessment ("SEA") and Habitat and Regulations Assessment ("HRA") within the SoR appendices in further detail, as well as revising the fWRMP SEA/HRA documents where appropriate. We have included in the final SEA the second stage Egham to Iver transfer and the small trading option on the River Thames.** **We recognise there are many stakeholders with a keen interest in some of the strategic options proposed in our plan which are covered under the SEA process, and we would like to continue to, or start to, engage with the relevant parties and stakeholders to help add to our knowledge base for each of these.** **In order to generate the SEA and HRA we engaged separate consultants to Thames Water, who reviewed the information provided about environmental impacts, mitigation and amenity potential for the SESR option as part of their analysis. Their analysis, as described within the SEA report, generally concurred with Thames Water, and outlines the construction mitigation required for the scheme in a way that is cross-compatible with our other options. The SEA confirmed the potential for amenity improvements as part of the scheme assessment, along with the need to design these improvements as part of the planning application process.** **We have reviewed the technical reports relating to the drought and climate resilience of the SESR provided to us by Thames Water, which were peer reviewed through their technical stakeholder working groups, and consider that these clearly demonstrate that the SESR can provide the quoted yield reliably across a wide range of drought severities. We note that drought severity within those documents is as measured for the Thames Water supply system. We have therefore also carried out an initial review of the yield that we can expect from 50Mm^3 of storage (one third of the reservoir capacity) under our drought design condition and confirmed that this should provide us with the expected 100Ml/d benefit. However, more detailed modelling, which will need to account for the 'secondary benefit' provided by increased effluent returns to Thames Water's intakes (see response** Error! Reference source not found.**), plus the differences in timing and duration between our critical drought events and Thames Water's critical drought events, is required before we can confirm the benefits from the scheme. This modelling is included within our AMP7 joint working investigations and is due to report before the crucial 2023 decision point.**
	Summary of any change to our final WRMP	Revisions made to the fWRMP19 SEA/HRA documents where appropriate.

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1.10	Representation	This plan should be completely rejected as being unfit for purpose.
	Our Response	**We acknowledge your view but believe that our fWRMP19 is robust, meets the requirements and guidance set out by our regulators, meets the long term needs of our supply area and is well supported by our customers.** **Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.**
	Summary of any change to our final WRMP	N/A