Appendix 9: Campaign to Protect Rural England (CPRE), Buckinghamshire

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1.1	Representation	We have responded against the Further Consultation questions contained in the Non-Technical Summary. The numbers refer to the questions therein.
	Our Response	**Thank you for your response.**
	Summary of any change to our final WRMP	N/A
1.2	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. Do you agree with this approach?* NO, but only in regard to the proposal to build a new reservoir. In general we agree with a parallel approach of improving supply and reducing demand. However we think Affinity could be (should be) setting more challenging targets in a number of areas where it already lags behind many other water companies, such as leakage reduction and deployment of smart meters.
	Our Response	**These points are addressed below at 1.3 and 1.6.**
	Summary of any change to our final WRMP	*If there is no change state: N/A*
1.3	Representation	2. *In our Plan, we aim to reduce leakage to between 11% and 13% by 2045, provided we can do it in an affordable way for customers. This would be a reduction of nearly 50% since 2015. Do you agree with this proposal?* NO. As we understand it, Affinity's leakage rates are worse than many other water companies, despite having a relatively newer infrastructure compared with some. While we welcome the proposals to reduce leakage, we think they can – and should – go further. According to analysis we have seen, while OFWAT and the NIC have set a target of 50% leakage reduction between 2020 and 2050, this Plan is only suggesting 40% reduction by 2050. Since we understand all other water companies have accepted the 50% target – even though a few (eg: Thames) are starting from an even worse base – we think that Affinity should be more ambitious in setting its reduction targets.
	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**

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		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.
1.4	Representation	*3a. We are proposing to construct a new storage reservoir in Oxfordshire, called the South-East Strategic Reservoir, in partnership with Thames Water. Do you agree with this proposal?* NO. This is our key objection. While our priority is to protect the chalk streams by substantially reducing abstraction from them (even eliminating it altogether), we think our goal can be achieved by a combination of other, more environmentally-friendly schemes. These include: • implementing the "Supply 2040" scheme as soon as possible, • fully utilising the existing supply from Anglian's Grafton reservoir • greater reductions in leakage (see answer to Q2 above) • reductions in demand through various means, including a faster roll-out of smart meters (see Q4) • greater water balancing measures, including with Thames Water (for instance, transferring up to 15Ml/day from its Slough-Wycombe-Aylesbury zone at Sunnymeads, which we understand is in surplus until at least 2080). Also we support the proposal to bring water from Birmingham (covered in Q3b below). With these – and other possible measures that we understand are already being considered, such as transferring water from areas such as the Severn – we believe the SESR would be unnecessary. Building a massive reservoir with 30m high embankments and destroying a huge area of good quality farmland seems to us to be the least environmentally attractive option and should be avoided at all costs.
	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.**

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		We have undertaken an options appraisal which follows the industry standard approach as set out in UKWIR (2002) as updated in the Decision-Making Process: Guidance (2016) referred to in the WRMP Guidelines. **Our analysis shows that for all four futures, the EBSD modelling selects the SESR option as the clearly preferred option for the first strategic supply scheme. We recognise, however, that there are a number of risks associated with this strategic option and there are uncertainties around the scope, operation and viability of the other strategic options. All of these uncertainties will need to be resolved to a satisfactory extent before our 2023 decision point.** **We have created a new 'stand alone' option based on the treatment and transfer (from the River Thames) elements of the SESR and Severn Thames Transfer (STT) schemes, but with an option that the source water may be provided by a trade with Thames Water.** **All strategic supply options other than the Thames-Affinity trading option were included within the economic (EBSD) modelling; we did not exclude "screen out" any strategic supply option prior to formal economic analysis. The reason that the Thames- Affinity trading option was not included as its own option was because the abstraction and transfer from the River Thames would be the same as for the Seven Thames transfer and SESR.** **We have clarified our position in relation to the Severn Thames Transfer. This is not selected as a preferred option within our economic and 'best value' analysis due to the high operational costs that results from our lack of raw water storage and our need to rely on Thames Water's storage to facilitate the scheme. However, that analysis is based on our independent development of the scheme. If the scheme is developed by the three company group (Thames, United Utilities and Severn Trent) that has been set up to investigate and potentially promote the option in AMP7, it may be possible for one of the three company group to offer us a cost effective trade. We are committed to liaising closely with this group during AMP7.** **For the South Lincolnshire reservoir, our analysis of the 'high growth' and extended sustainability reduction scenarios, has confirmed that we should include appropriate investigations in AMP7 in parallel with the SESR and GUC transfer to enable us to adapt to such a scenario.**
	Summary of any change to our final WRMP	Updated Chapter 5, Chapter 6 in fWRMP19 and Technical Report 4.9.
1.5	Representation	*3b. 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. Do you agree with this proposal?* YES. However we think you should move beyond "continuing to investigate" to taking action. Certainly well within the timeframe of this Plan.
	Our Response	**Both of our strategic options, SESR and GUC, require a 15-year lead time. The GUC option has a 9-year development period, but currently there is no supporting water quality data or environmental investigation data. We have reviewed the timescales involved in these initial investigations as part of our Business Plan development and consider that we will be in a position to confirm the scope and environmental viability of the scheme. Under our "Challenging" future we need to be able to confirm the selection of our preferred strategic option in 2023, as we will need to start planning and development of the SESR if this remains 'best value'. This is our first tipping point, and given the up-front investigation time required for the GUC transfer we consider that we have enough time to investigate this as a potential alternative scheme. At this first tipping point we also need to be able to determine whether we are facing a "Challenging", "Expected" or "Optimistic" Future (which**

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		could become an "Aspirational" Future) in order to confirm the need for strategic development.
	Summary of any change to our final WRMP	Updated Chapter 5 in fWRMP19.
1.6	Representation	*4. 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. Do you agree with this proposal?* YES. However we think Affinity should go further. We understand Affinity are still installing dumb meters, while many other water companies have been rolling them out for some time. We cannot comment on what is affordable or acceptable, but in the long term we think it may be necessary for customers to accept different standards to those we are used to.
	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 fWRMP19.
1.7	Representation	*5. 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. Is this proposal acceptable?* It is not appropriate for us to comment.
	Our Response	**N/A**
	Summary of any change to our final WRMP	N/A
1.9	Representation	*6. Do you have any other comments you would like us to consider? Please state below:* As we have stated, our priority is to reduce the abstraction from chalk streams to near zero, and ensuring the aquifer that feeds them is truly sustainable. We think the plan does not sufficiently acknowledge that, by reducing chalk stream abstraction, more water will go into the rivers that they flow into (mainly the Thames), where it can be extracted in a more sustainable and environmentally friendly way.
	Our Response	**Our fWRMP19 includes a scenario to test the implications of sustainability reductions in our sensitivity analysis. Within this scenario we will need to continue limited reliance on Drought Orders and Permits until our first strategic resource can be developed. We would therefore need to consider developing either the GUC transfer, or a water trading option with Thames Water as these have shorter lead times than the other strategic options.**

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		As a result of our sensitivity analysis of "high growth" and of sustainability reductions our fWRMP19 provides for us to assess at the 2023 decision point whether the risk from high-growth and/or additional sustainability reductions is such as to require acceleration of supply-side development beyond our Challenging future. This has been included as an additional adaptive pathway in our strategy. Under this scenario we will need to continue to rely on some Drought Orders and Permits (in the order of 6 to 12Ml/d) until a strategic scheme is developed. We may therefore need to develop shorter lead time options such as the GUC transfer to reduce the period over which we have to continue to rely on these orders and permits. If reliance on shorter lead time schemes has significant cost implications (once AMP7 investigations have confirmed scope and cost of schemes), then we will need to consult with customers to determine their views on incurring this additional cost.
	Summary of any change to our final WRMP	Updated Chapter 5 in the fWRMP19.
1.10	Representation	If, after this consultation, Affinity is still considering the SESR, then we would call for a public enquiry, as this is of such strategic importance to the countryside and the environment.
	Our Response	**The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.**
	Summary of any change to our final WRMP	N/A