

Appendix 12: Canal and River Trust

1. Canal and River Trust		
1.1	Representation	We believe the Trust can play a significant role supporting the water sector as it strives for resilience and affordability in delivering public water supply. Our waterway infrastructure already exists and with investment from the sector could unlock resilient and cost-effective water transfer schemes across England and Wales and where available using our surplus water.
	Our Response	We agree with the Trust and look forward to continuing our work with them on the various options that we are working on together.
	Summary of any change to our final WRMP	N/A
1.2	Representation	In our opinion, the revised plan Affinity Water have produced clearly demonstrates the complex water supply and demand challenges they face with a logical approach to dealing with them. The planning period outlook images they have prepared for each of their supply regions illustrate these challenges well and are useful to the reader.
	Our Response	No comment.
	Summary of any change to our final WRMP	N/A
1.3	Representation	We also approve of the short, animated video 'Have Your Say' Affinity Water have used to introduce their revised draft Water Resources Management Plan 2019, particularly with the reference to transferring water via an existing canal.
	Our Response	No comment.
	Summary of any change to our final WRMP	N/A
1.4	Representation	<p>1. Brent Reservoir 7.5 MI/d transfer scheme</p> <p>We are pleased to note that Affinity Water have responded positively to our initial representation to their draft Water Resources Plan and have brought forward the Brent Reservoir scheme for implementation by 2034 in their expected future scenario.</p> <p>We will continue to work closely with Affinity Water on this scheme to ensure that all the required assessments are completed to ensure it is delivered within the agreed timeframe and optimised accordingly.</p>
	Our Response	<p>The EA have requested that monitoring of the River Brent downstream of the reservoir will likely be required (water quality and flows), as with the Grand Union Canal (GUC) between the River Colne and River Brent, ecology monitoring will also be required (Water Framework Directive).</p> <p>We will continue to work with the Trust and meet with all parties to incorporate the items as raised by the EA.</p>
	Summary of any change to our final WRMP	Additional items as above added to the WRMP AMP7 workplan
1.5	Representation	2. Slough Boreholes 3 MI/d transfer scheme

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		<p>Again, we are pleased to note that Affinity Water have responded positively to our initial representation and have brought forward the Slough Borehole scheme for implementation by 2039 in their expected future scenario.</p> <p>It is recognised that Affinity Water have combined the assessed deployable output for this Trust owned asset with that from the GSK owned boreholes in Slough.</p> <p>We will continue to work closely with Affinity Water on this scheme to ensure that the required assessments are completed, and the most efficient delivery mechanism is utilised.</p>
	Our Response	The Trust should be aware that the EA have raised a concern with the GSK borehole element of this scheme and the potential impacts on the Salthill Stream. This is not directly related to the Trust but as the scheme is a joint scheme it is a consideration that the Trust should be aware of.
	Summary of any change to our final WRMP	N/A
1.6 Representation		
1.6	Representation	<p>3. Grand Union Canal (GUC) 50 Ml/d transfer scheme</p> <p>Following on-going discussions with Affinity Water, the Trust are pleased to see that the GUC transfer has now been selected as one of the chosen strategic supply schemes for WRZ1. We understand that the GUC transfer scheme is the second strategic scheme to be chosen by Affinity Water behind the South East Strategic Reservoir (SESR) which has the potential to supply both WRZ1 and WRZ4.</p> <p>Having examined the published data, we have reviewed the comparison of the preferred SESR transfer combined with the Harefield New Treatment Works (required to support the transfer) against the GUC scheme and how the cost effectiveness is presented for WRZ1. The table is summarised in the representation as the published WRP data in tab '5. Feasible Options':</p> <p>Affinity Water have confirmed that the new treatment works at Harefield are required to ensure that the transferred water from the SESR is suitably treated for potable distribution. Therefore, we calculate the combined Totex NPV as £436,205k (£365,385k + £70,820k) which would mean the AISC for the Abingdon scheme is calculated as 143.9 p/m³, and hence, on the face of it, more expensive than the GUC scheme. If this is correct, it would lead us to question why the SESR scheme is selected ahead of the GUC scheme for WRZ1. Affinity Water have acknowledged our concern and explained that the difference is related to the annuitisation of capital costs used in their EBSD model and have sought further clarification from the Environment Agency prior to completing Table 5 in their final plan.</p> <p>We believe that these highlighted cost discrepancies in the published information need to be resolved to reassure all parties that schemes are evaluated fairly and consistently.</p> <p>In addition to this, we understand that Affinity Water have assumed the raw water from the GUC transfer be subject to enhanced barrier treatment. We believe there may be some cost efficiency to be gained here as no other Water Company, who utilise canal transfers for ultimate public water supply, employ barrier treatment at their works. We realise that assumptions on the treatment method have been made due to the lack of available water quality data and look forward to working closely with Affinity Water during AMP7 to help inform their adaptive planning.</p> <p>Overall, we believe the GUC transfer scheme will prove to be a resilient and cost-effective supply scheme for Affinity Water's customers and therefore should be the first choice strategic scheme for delivery, ahead of the SESR.</p>
	Our Response	<p>The GUC is the strategic alternative to the SESR option except for our high growth or extended sustainability reduction scenario where rapid development is required and the GUC becomes the first strategic option for development by 2032 in our fWRMP19.</p> <p>We agree that Table 5 costs require greater clarity and have consulted with the EA on the most appropriate way to complete the tables. Our fWRMP19 incorporates a</p>

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		<p>revised interpretation of the costs that provide the financing and repayment costs that are broadly comparable with the way that the scheme was modelled in the EBSD model.</p> <p>We are addressing the scope of the option and the requirement for barrier treatment as part of the joint work that we have programmed with the Trust for AMP7 on the GUC scheme. The baseline water quality surveys will provide an evidence base for the treatment scope of the scheme.</p> <p>It should be noted that in terms of costing we did not apply the same optimism bias to the GUC transfer that was applied to the South East Strategic Reservoir and the Severn Thames Transfer (44% uplift on the main scheme element), specifically because we recognise that the current scope is conservative. A comparison of the costing methods has been included within Technical Report 4.4: LRM Cost Model Update.</p> <p>We would also like to refer the Trust to the EA WRMP Evidence Report (Appendix 1) which sets out the potential risks associated with the scheme that will need to be incorporated into the ongoing work programme for the scheme going forward.</p>
	Summary of any change to our final WRMP	N/A
1.7	Representation	<p>Whilst we are pleased that Affinity Water have listened to the Trust's representation and brought forward both the Brent Reservoir and Slough Borehole options together with including the GUC transfer scheme, we remain concerned that greater transparency of cost information is required to ensure that the optimum supply solutions are duly selected.</p> <p>We look forward to fully engaging with Affinity Water to develop these schemes further and to demonstrate that the best investment decisions are made.</p>
	Our Response	<p>We have provided the Trust with further information relating to the costs for the GUC scheme as part of WRMP19 and will continue to provide as much information as is possible.</p> <p>Going forward, we will be working closely with the Trust as part of the development phase of the scheme and the gated process that we have set out in our joint working proposals for the GUC scheme.</p>
	Summary of any change to our final WRMP	No change to the WRMP, however our Business Plan contains additional information on the GUC scheme, that information has been shared with the Trust.