

## Appendix 31: Vale of White Horse District Council

1. Vale of White Horse District Council		
1.1	Representation	<p>Vale of White Horse District Council supports the twin-track approach to improve water supply resilience through reduced demand and increased supply options. However, we are concerned at the SESRO option being identified as the preferred strategic option. We support a public inquiry to ensure a correct and robust process has been followed, as explained further in Question 6 below.</p> <p>Affinity Water and Thames Water have both set out adaptive plans to allow decision-making in a timely manner that can also include potential deferring of investment on strategic supply options. Up to the first decision point in 2023, Affinity Water will commence a monitoring plan of technical work, policy decisions and enabling actions, with the intention to progress SESRO as the preferred option.</p> <p>The Council notes that if SESRO is not progressed at the 2023 or 2037 decision points, other options such as GUC and/or South Lincolnshire Reservoir will be progressed.</p> <p>The Council remain to be convinced that the proposed reservoir at Abingdon is necessary or effective, or would be the optimal and most appropriate solution to address the future water needs of the South-East of England.</p> <p><b>The Council consider that the environmental, highway and landscape impacts associated with the future construction and operation of a reservoir of this scale and magnitude, on the residents of the Vale of White Horse, would be so great that significant detailed assessment is required to demonstrate that alternative sites have been properly explored within the South-East region for their suitability for such as reservoir.</b></p>
	Our Response	<p>In terms of the siting of a strategic reservoir for the South East of England, all water companies in the region liaise on a regional basis through the Water Resources in the South East (WRSE) group. Through this group we share our options assessments for each companies' WRMP. This options appraisal process contains a wide ranging and comprehensive assessment of options, including all reasonable potential new reservoir sites. These are then screened through to a shortlist of potential options that are assessed both within WRMPs and by the WRSE as a whole.</p> <p>Other reservoir sites have been identified for potential development in the South East and have therefore been contained in the modelling. However, the other options are relatively small and are taken up through more localised need within the regional and local planning. The only sites that can potentially provide sufficient scale of resource are those that are linked to either the River Thames or River Trent. Both of these have been assessed by Thames and Anglian Water respectively, and the best value option generated by their review process are the SESR and South Lincolnshire reservoirs respectively. These are therefore the two reservoir options that we have included in our analysis alongside the other strategic schemes.</p> <p>We have carried out the review of potential sites within our own supply area, and identified the Brent, Birds Green and Honeywick options, but all these are small, and of these only the Brent Reservoir is potentially economically viable as it uses an existing Canal and Rivers Trust asset.</p>
	Summary of any change to our final WRMP	N/A
1.2	Representation	<p>Affinity Water has committed in their revised draft WRMP to reduce leakage by 50% by 2045. Vale of White Horse District Council supports this ambition. However, we would welcome a further commitment by Affinity Water to reduce leakage by 50%, in line with other neighbouring water companies' Water Resources Management Plans and national targets set by the National Infrastructure Commission (NIC) and Ofwat. Furthermore, given the period of this Plan is up to the year 2080, we would expect to see a commitment from Affinity Water for further leakage reduction.</p>

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	Our Response	<p>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.</p> <p><b>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.</b></p>
	Summary of any change to our final WRMP	Updated Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.
1.3	Representation	<p>As mentioned in our response to Question 2, Vale of White Horse District Council objects to this proposal as the SESRO will have substantial environmental, highway and landscape impacts during construction and when in operation. The scale and magnitude of these impacts on our residents would be so great, that significant detailed assessment is required to demonstrate alternative sites have been properly explored.</p> <p>The Council consider that the revised draft Plan seeks to establish the principle for constructing a new reservoir at Abingdon, but does not appropriately assess the specific scheme or identify and assess the potential implications of this scheme and other schemes in sufficient detail e.g. landscape impact, biodiversity, heritage, highways and flood risk.</p> <p>The Council also note Affinity Water does not provide details on the conceptual design of the SESRO. An additional supply of 100MI/d is required which will ultimately influence the final design of this proposal.</p> <p><b>The Council consider that the draft Plan should take into account the design of each option and its likely impacts, for example landscape, highways, biodiversity and flood risk, in significant detail before any decisions are taken on which options is the most appropriate.</b></p>
	Our Response	<p><b><i>Flooding Risk of SESR</i></b></p> <p>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).</p> <p><b><i>SEA and HRA</i></b></p> <p>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.</p> <p>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.</p> <p><b><i>Environmental Effects and Mitigation</i></b></p>

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		<p>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.</p> <p><b>Resilience to Drought of the SESR</b></p> <p>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<sup>3</sup> 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.</p>
	Summary of any change to our final WRMP	N/A
1.4	Representation	<p>The Council is aware that, ultimately, Government will decide whether it is necessary to hold a public inquiry or whether to adopt the draft Plan in its current form.</p> <p>As referred to in our response to Thames Water’s revised draft WRMP 2019, given the scale and magnitude of the SESRO proposal, and for the reasons provided above, the Council is of the firm view that a public inquiry should be held. The Council consider a public inquiry would further examine Affinity Water’s and Thames Water’s draft WRMP to ensure a correct process has been followed and the implications for each ‘option’ have been fully assessed and explored in an appropriate level of detail.</p> <p>Through discussions with Thames Water, they have provided reassurance that future growth associated with the Oxfordshire Housing and Growth Deal and the proposal for an Oxford to Cambridgeshire Expressway has been accommodated into their long-term forecasts for growth in their revised draft WRMP. It is unclear whether Affinity Water has also factored this level of growth into their forecasts for their revised draft WRMP. Further clarification on this matter by Affinity Water is welcomed.</p> <p><b>The Council recommend that a public inquiry is held to further examine the draft WRMP to ensure a correct process has been followed and the implications for each option and the evidence to support the Plan has been fully assessed and explored in an appropriate level of detail.</b></p>
	Our Response	<p><b>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</b></p> <p><b>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.</b></p> <p><b>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</b></p>

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		<p>supply option to 2032. We would need a second strategic option by 2042 and a third strategic option within the 2080 time horizon.</p> <p>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.</p>
	Summary of any change to our final WRMP	Our fWRMP19 addresses GLA growth through inclusion of a “high-growth” scenario in our sensitivity testing.