

Appendix 21: Garford Parish Meeting

1. Garford Parish Meeting		
1.1	Representation	<p>I write to you in my capacity as elected Chair of Garford Parish Meeting a village situated within one mile of the north west corner of the proposed reservoir contained within Affinity Water DWRMP</p> <p>Together with our Planning Committee members we have carried out a door to door consultation process in order to gauge the opinion of as many residents as possible concerning the plan to construct the 150 million cubic meter reservoir.</p> <p>The overwhelming majority, approximately 70%, of the residents of Garford, are strongly opposed to the proposal for many reasons including but not limited to the following issues.</p>
	Our Response	We welcome the engagement you have undertaken at a local level and are eager to work with you going forward.
	Summary of any change to our final WRMP	N/A
1.2	Representation	<p>The proposed reservoir will cause the destruction of a vast area of the Vale of the White Horse Lowlands flood plain with a consequent devastating impact on the flora and fauna. With a plan area in excess of 4 square miles surrounded by earthwork embankments approaching 100 feet high, the existing nature and appearance of the area will disappear forever, obliterating open views of lowlands with the chalk downs as a backdrop from most locations to the west, east and north of the proposed site.</p>
	Our Response	<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>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>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 50Mm³ of storage (one third of the reservoir capacity) under our drought design condition and confirmed that this should provide us with the expected 100MI/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>

1. Garford Parish Meeting		
	Summary of any change to our final WRMP	Revisions made to the fWRMP19 SEA/HRA documents where appropriate.
1.3	Representation	The proposal will remove significant areas of flood plain in an area where major new developments for housing and commerce are already being built and it is a fact that many more are planned. The potential for increased flood risk as a result of these developments is obvious. Building a reservoir in the middle of this increasing area of flood risk will exacerbate this risk significantly and possibly to an indeterminate level.
	Our 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).
	Summary of any change to our final WRMP	N/A
1.4	Representation	The primary purpose for the construction of this facility is to provide part of the long term solution to the projected water demands for London and the South East. It would be of no benefit whatsoever to local communities or even the county of Oxfordshire or its neighbours, in which it will be sited.
	Our Response	The SESR is part of a regional water resources strategy to provide future resilience for water supplies across the wider South East region and local communities, not just the water demands in London and the South East. Significant coordination has been undertaken between ourselves and other water companies when producing our respective WRMPs. This included coordination between the companies on approaches to adaptive planning, checking volumes of existing and proposed transfers and shared options to address deficits in supply-demand balance. As part of both the Business Plan and WRMP updates we have directly coordinated with Thames, Anglian, Southern, United Utilities and Severn Trent Water to ensure our proposals for AMP7 (2020 to 2025) strategic scheme investigations are fully aligned. The dates presented for our adaptive strategy and monitoring plan reflect that process.
	Summary of any change to our final WRMP	N/A
1.5	Representation	It is widely acknowledged that there are other options available to solve the future demands of the south east. These include, desalination, water transfer from areas of high rainfall with low population (such as the Severn Thames scheme), more efficient use of available resources, new technologies and most importantly, a firm and unshakable commitment to implement a robust plan for fixing water leaks within the existing infrastructures. The poor record in this area is well known and needs to be addressed. Projections for growth in demand have already been proven to be excessive and still are unsubstantiated and extremely questionable.
	Our Response	<i>Strategic options:</i> 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

1. Garford Parish Meeting

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 (EBSO) 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.

Leakage:

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.

Population growth:

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

1. Garford Parish Meeting		
		review our forecasts as new information becomes available as reflected in our adaptive plan.
	Summary of any change to our final WRMP	Updated Chapter 5 and Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19. Our fWRMP19 addresses GLA growth through inclusion of a “high-growth” scenario in our sensitivity testing.
1.6	Representation	Thames have stated openly that a significant proportion of the water stored in the proposed reservoir would be sold to other water companies. The brief mention that this major development on our doorstep is given in Affinity Water's draft plan is proof of this.
	Our Response	The development of the reservoir will be carried out to provide water to customers in line with the statutory duty of both Thames and Affinity Water to provide supplies. It should be noted that, at this stage, the proposal is that investigation and promotion will be carried out jointly by Affinity and Thames Water, with joint funding through the regulatory price control process. The exact commercial arrangements on any development have not been finalised, and it may be that construction and development would be carried out by a third party in line with the economic regulator's (Ofwat) rules on direct procurement. Any suggestion that Thames Water is seeking to promote the reservoir to make profit through a 'buyer-seller' type arrangement is not reflective of the regulatory proposals contained in our WRMPs or Business Plans.
	Summary of any change to our final WRMP	N/A
1.7	Representation	The conclusions of the 2010 Public Enquiry which rejected Thames Water's proposal to construct a reservoir on this location have been totally ignored in this new plan which indicates a high level of corporate arrogance and a complete lack of attention to local opposition.
	Our Response	We have also incorporated further clarity and detail on the AMP7 Monitoring Plan in Chapter 6 of our fWRMP19. As well as the metrics that will be monitored, we have included proposals for stakeholder engagement and information sharing, based around four key ‘themes’: <ul style="list-style-type: none"> • Theme 1: Small scheme investigations – this will involve working with the EA, Natural England (NE) and the Canal & River Trust to confirm the viability of smaller schemes such as the Brent Reservoir and the Lower Greensand schemes. • Theme 2: Reductions in Abstraction - we propose to re-start the Chalk Rivers Partnership that was trialled in AMP6 and incorporate Catchment Partnerships into our review process, with a view to determining the probable level of future sustainability reductions in time for the 2023 decision point. • Theme 3: Managing Growth and Demand - we propose to form a Partnership for Managing Growth and Demand, who we will consult with on updates to growth forecasts and the data and findings from our demand management and leakage programmes. We will also consult on a regular basis with Thames Water, to share progress on demand management and considerations of delivery risk. • Theme 4: Strategic Option Investigations - this will primarily be managed through the gated development process described above; the individual schemes will require stakeholder engagement plans to be developed as part of the investigations.
	Summary of any change to our final WRMP	Further clarity and detail on the AMP7 Monitoring Plan in Chapter 6 of our fWRMP19.

1. Garford Parish Meeting		
1.8	Representation	For all of the reasons above, we register our objection to Affinity Water's plans in particular the reference to a reservoir in the Vale of the White Horse and we therefore call on the Secretary of State to either reject these proposals outright or to instruct a further public enquiry when these many and important questions will have to be fully considered and answered.
	Our Response	<p>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.</p> <p>Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan (see response to 1.7 above).</p> <p>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</p>
	Summary of any change to our final WRMP	N/A