

## Appendix 28: Oxfordshire County Council

1. Oxfordshire County Council		
1.1	Representation	Oxfordshire County Council's particular concern is in respect of the SESR water supply option. We support analysis of different future scenarios which recognise that future population forecasts may change and/or innovation may affect the amount of need for water. Oxfordshire County Council would like to see a commitment to revise the list of strategic supply options in the light of changing forecasts and advances in technologies.
	<b>Our Response</b>	<b>We have provided further explanation of how we intend to continue the work on alternatives to preferred strategic regional options in our plan e.g. liaison for the STT and water trading options with Thames Water.</b>
	Summary of any change to our final WRMP	Updated Chapter 5 in fWRMP19.
1.2	Representation	Oxfordshire County Council considers that there should be further investigation of the alternative options. Oxfordshire County Council is concerned that the adaptive decision-making process as represented in Figure 2 below appears to only figure monetary costs (for example it says that the GUC option will only be progressed directly at 2023 if it 'can be delivered at lower cost than SESR'), whereas other disbenefits and benefits need to be fully explored and taken into account in the decision-making process.
	<b>Our Response</b>	<p><b>We have provided further explanation of how we intend to continue the work on alternatives to preferred strategic regional options in our plan e.g. liaison for the STT and water trading options with Thames Water.</b></p> <p><i>Decision-making (including MCA)</i></p> <p><b>We have added a clear MCA check to Step 3 of our decision-making process to confirm that our plan is "best value".</b></p> <p><b>We have also added greater clarity and explanation to the Technical Report 4.9: Economics of Balancing Supply and Demand Modelling and Decision-Making Process.</b></p> <p><b>Costs</b></p> <p><b>We have continued to provide additional cost transparency where it is possible to do so in Technical Report 4.4 LRMC cost model update, and have agreed the approach to the representation of financing and repayment costs for large capital schemes in Table 5 of the WRMP. We have updated the costs included in our fWRMP in response to better information becoming available between publication of our rdWRMP and our fWRMP.</b></p>
	Summary of any change to our final WRMP	Updated in Chapter 5 of our fWRMP19 and Technical Report 4.4 LRMC cost model update.
1.3	Representation	Oxfordshire County Council requests that water companies in the South East collectively and clearly present their supply needs in a regional context, preferably through a Regional Water Resource Management Plan.
	<b>Our Response</b>	<p><b><i>Alignment with our Business Plan and other Water Companies</i></b></p> <p><b>Although we were generally aligned at the rdWRMP19 stage, our final WRMP will be fully consistent with neighbouring company WRMPs in respect of shared option timing and magnitude of water supplied to Affinity Water. Our adaptive strategy allows us to do that.</b></p>

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		<p>Since the revised draft WRMP submission we have continued to work with our strategic regional option partners. Our final WRMP provides a summary of that work to help enable further transparency to stakeholders and customers. As noted above, we have specifically referred to Thames Water's adaptive plan in our WRMP, and highlighted the alignment in investigations, development and adaptation between our two plans. We are fully aligned around the 2023 decision point, with early review in 2022 based on the 'Gate 1' stage of the Business Plan proposal. In terms of the costs and magnitude of benefits, we have explained the derivation of our 50MI/d plus 50MI/d two stage approach to SESR, and confirmed that this has been modelled by Thames Water in their updated revised submission, plus we have modelled a single 100MI/d version and confirmed that this is still selected as the preferred option in our 'best value' analysis. We have therefore confirmed the need for 100MI/d from SESR, as modelled by Thames in its analysis. We have also confirmed the sharing of costs and yield with Thames on the STT and with Anglian Water on the South Lincolnshire reservoir.</p> <p>Our Business Plan submission on the 1st April 2019 also provides additional information relating to our proposals for joint working and collaboration with partners for all our strategic regional options. These proposals include the shared understanding of the scheme descriptions, our approach to joint working methods and activities, scheme costs and programmes, and gated deliverables linked to an Outcome Delivery Incentive type mechanism.</p> <p>We will continue to work closely with other water companies via the Water Resources South East regional group.</p>
	Summary of any change to our final WRMP	N/A
1.4	Representation	Oxfordshire County Council considers there is a need for a public inquiry on both the Thames Water and Affinity Water WRMPs, to ensure a correct and robust process has been followed and the implications for each option have been fully assessed and explored in an appropriate level of detail. This would provide clarity on the need for, location and size of any potential reservoir near Abingdon or within the south-east region.
	<b>Our Response</b>	<b>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</b>
	Summary of any change to our final WRMP	N/A
1.5	Representation	Oxfordshire County Council's conceptual design concerns are raised in paragraphs 24-59 of the November 2018 TW-WRMP19 Response in Appendix 2 and these should be referred to. Further discussion on conceptual design issues is sought.
	<b>Our Response</b>	<p><b><i>Monitoring Plan</i></b></p> <p>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':</p> <p><b>Theme 1: Small scheme investigations – this will involve working with the EA, Natural England (NE) and the Canal &amp; River Trust to confirm the viability of smaller schemes such as the Brent Reservoir and the Lower Greensand schemes.</b></p> <p><b>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.</b></p> <p><b>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</b></p>

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		<p>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.</p> <p><b>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.</b></p> <p><b>Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.</b></p>
	Summary of any change to our final WRMP	Updated Chapter 6 in our fWRMP19.
1.6	Representation	The County Council supports the twin-track approach to improve water supply resilience through both reduced demand and increased supply options. However, we are concerned at the SESR being identified as the preferred strategic option. We support a public inquiry to ensure a correct and robust process has been followed and the implications for each option have been fully assessed and explored in an appropriate level of detail.
	<b>Our Response</b>	<p><b>We have provided further explanation of how we intend to continue the work on alternatives to preferred strategic regional options in our plan e.g. liaison for the STT and water trading options with Thames Water.</b></p> <p><b>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</b></p>
	Summary of any change to our final WRMP	Updated Chapter 5 in our fWRMP19.
1.7	Representation	The County Council considers that the leakage target should be more ambitious, and Affinity Water should be more committed to this, given the environmental costs. The County Council also expects that there be a commitment to further leakage reductions beyond 2045 considering the plan goes to 2080. Significant reductions in leakage could reduce the need to develop strategic supply options.
	<b>Our Response</b>	<p><b>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.</b></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.
1.8	Representation	The County Council objects to this proposal based on concerns raised throughout this response and the appendices. The SESR would have substantial environmental, transport and landscape impacts in Oxfordshire both during construction and when in operation.
	<b>Our Response</b>	<b>SEA and HRA</b>

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		<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><i>Environmental Effects and Mitigation</i></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>
	Summary of any change to our final WRMP	N/A
1.9	Representation	Grand Union Canal - the County Council supports further investigation and development into this scheme based on the need to action alternative options to the SESR scheme.
	<b>Our Response</b>	<b>We welcome your support.</b>
	Summary of any change to our final WRMP	N/A
1.10	Representation	The County Council supports Affinity Water’s ambition to reduce individual water use, as a way of managing strain on future supply scenarios.
	<b>Our Response</b>	<p>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.</p> <p>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.</p>
	Summary of any change to our final WRMP	Updated Chapter 6 in fWRMP19.
1.11	Representation	The County Council does not have any comments, other than to query the question as the increase quoted is a £22 rise in average customer bills per year.
	<b>Our Response</b>	The increase quoted is a £22 rise in average customer bills over the length of the plan, 2020 – 2080, rather than a £22 rise in average bills per year. This equates to an average rise of 37 pence per customer per year. This figure does not include inflation or wastewater (sewerage) bills.

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	Summary of any change to our final WRMP	N/A
1.12	Representation	<p>Conclusion</p> <p>Oxfordshire County Council's position has not changed from its response on Thames Water's revised draft WRMP in November 2018. Oxfordshire County Council is supportive of the approach being taken by water companies to build in resilience in their investment programmes and take an adaptive approach to decision making. However, we <b>OBJECT</b> to the current Affinity Water WRMP in respect of the proposals for a SESR as we did for the Thames Water WRMP and we consider that other alternatives should be further investigated. Oxfordshire County Council considers that a public inquiry should be held to ensure a correct and robust process has been followed on both the Thames Water and Affinity Water WRMPs and the implications for each option have been fully assessed and explored in an appropriate level of detail.</p>
	<b>Our Response</b>	<p><b>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.</b></p> <p><b>Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.</b></p> <p><b>The decision to progress to a public enquiry is one that will be made by the Secretary of State, Defra.</b></p>
	Summary of any change to our final WRMP	N/A