

Appendix 30: Steventon Parish Council

1. Steventon Parish Council		
1.1	Representation	We are extremely disappointed that Affinity Water has made no effort to engage with local councils and communities. This is a major shortcoming considering the location of the proposed new reservoir.
	Our Response	<p>As residents in the Oxfordshire area are not our customers we did not engage with them directly.</p> <p>We met with Oxfordshire County Council and the Vale of the White Horse District Council and the Group Against Reservoir Development (GARD), on two occasions, to hear and discuss their concerns directly.</p> <p>The further consultation was open to all stakeholders and we received written representations from the following:</p> <ul style="list-style-type: none"> • Oxfordshire County Council • Vale of the White Horse District Council • GARD. • Ardington and Lockinge Parish Council • East Hanney Parish Council • Garford Parish Meeting • Green Corridor Group • Group Against Reservoir Development (GARD) • 125 Individuals from the Oxfordshire area • Steventon Parish Council • Wantage and Grove Campaign Group • West Hanney Parish Council <p>Our further consultation online survey received 43 responses from the Oxfordshire area.</p> <p>Representatives from GARD and East Hendred Parish Council attended our Stakeholder Assembly.</p> <p>All the above representations and responses have been considered in the development of our final Plan and addressed in our Statement of Response.</p>
	Summary of any change to our final WRMP	N/A
1.2	Representation	Steventon Parish Council is aware that £36.5 m has been allocated to Affinity and Southern Water together with Thames Water who also have been allocated £36.5m to investigate further the uncertainty of assumptions made and predictions for the proposed reservoir. The fact that this money has been made available implies that there are significant gaps in knowledge and uncertainty in assumption made.
	Our Response	<p>The WRMP is a strategic document that relies on outline design for supply options, and currently available information for demand management. For large strategic schemes such as the SESR, GUC transfer and South Lincolnshire Reservoir, once they have been identified as preferred options under the WRMP then investigations are initiated to create planning level designs that can be used at a later date for the planning application. The allocation of investigation funds therefore represents standard good practice that ensures uncertainties are resolved before planning application activities start. For this WRMP we have identified that we will provide best value for money to customers by maintaining an adaptive approach, which includes these investigations for three of our potential strategic options, plus close liaison with the working group that is carrying out parallel investigations for the Severn Thames Transfer. This approach recognises the significance of the strategic schemes that are being proposed, and will provide additional certainty that the correct scheme is promoted beyond the 2023 point, which is reflective of the cost and potential impacts associated with such options.</p>

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	Summary of any change to our final WRMP	<i>If there is no change state: N/A</i>
1.3	Representation	Several river and angling lobbies call for the reservoir to be built to reduce the need to abstract water from stressed chalk streams, but Affinity's own plan proposes a much faster way of achieving this using water from Anglian's existing Grafham reservoir. We consider that Affinity Water should make clear to all stakeholders that chalk stream sustainability reductions can be achieved by 2025, without waiting until 2038 for the reservoir.
	Our Response	This is clearly presented within our fWRMP19 in relation to the AMP7 WINEP sustainability reductions. Sustainability reductions beyond this may, however, require acceleration of the delivery of strategic options, as described under our amended adaptive plan in Chapter 6 of the fWRMP19.
	Summary of any change to our final WRMP	Amended adaptive plan in Chapter 6 of the fWRMP19.
1.4	Representation	We welcome Affinity's 'Supply 2040' scheme allowing transfer of water from South to North of their Central Region, and consider this should be brought forward to increase adaptability in responding to any increased demand, allow larger, quicker reductions in chalk stream abstractions and improve the ability to manage London supplies.
	Our Response	<p>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.</p> <p>In summary, all of the proposed AMP7 developments, which are detailed in our Business Plan, are required to support the transfer of 17MI/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.</p> <p>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.</p> <p>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.</p> <p>We have modelled the implications of our extended sustainability reduction scenario and presented the implications and costs in the fWRMP19 in Chapter 5. Potential adaptations to accommodate this are reflected in our revised adaptive strategy.</p>
	Summary of any change to our final WRMP	Updated Chapters 5 and 6 in fWRMP19 and Technical Report 4.9: Economics of Balancing Supply and Demand Modelling and Decision Making Process.
1.5	Representation	We consider that the population forecasts used to calculate demand are unrealistically high and should take account of local authorities' actual historical build rates. It would also be useful to indicate the degree of uncertainty in forecasts.

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	Our Response	<p>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.</p> <p>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.</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.
1.6	Representation	We consider that Affinity’s leakage rates are unacceptable. They are much higher than companies that serve similar areas and their plans for reductions are too low and too slow. At a minimum, reductions should meet or exceed Ofwat targets.
	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>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.</p>
	Summary of any change to our final WRMP	Updated Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19.
1.7	Representation	We consider that Affinity Water is too slow to encourage water consumption reduction. Metering efforts are inadequate, and poor compared with other water companies. If Anglian Water can aim for 95%-meter penetration by 2030, why can’t Affinity?
	Our Response	<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>

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	Summary of any change to our final WRMP	Updated Chapter 6 in fWRMP19.
1.8	Representation	We believe that plan changes and ambitious leakage and water-use targets would push back the need for a water source such as the reservoir until the 2050s or remove the need completely.
	Our Response	<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> <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	Updated Chapter 6 in fWRMP19.
1.9	Representation	It is noted that the planned reservoir obstructs vital flood plain, including Flood Zone 3. Indeed studies by Thames Water have indicated that a reservoir this size would not leave enough space to create flood compensation zones. Why then is Affinity Water even considering a scheme that will lead to increased flood risk for surrounding towns and villages?
	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
1.10	Representation	We believe that a robust case has not yet been made to allow the construction of a new reservoir.
	Our Response	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.

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		Going forward we are eager to work with you to address your concerns through involvement in our Monitoring Plan.
	Summary of any change to our final WRMP	N/A