

Appendix 37: Oxfordshire area Individual stakeholder responses summary

The below is a summary of the 125 individuals also responded who are resident in Oxfordshire. As these are not Affinity Water customers we have classified them as stakeholders for the purpose of this report. Personal details of those individuals who did respond have not been provided in line with data protection and privacy requirements.

1. Oxfordshire area Individual stakeholder responses summary		
1.1	Representation	We wish to register our objections to Affinity Water's revised draft Water Resources Management Plan, which is badly thought out, lacks ambition and is unfair to customers.
	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. 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
1.2	Representation	Plans to tackle leakage are below the target set by the water regulator and Affinity should bring leakage down to the industry average by 2050. Similarly, targets to reduce individual consumption lag behind the best in the industry by a significant margin.
	Our Response	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. 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.
	Summary of any change to our final WRMP	An update regarding leakage is provided in Chapter 6 and Technical Report 4.8: Leakage Strategy Report in the fWRMP19.
1.3	Representation	In terms of future demand, the population forecasts are unrealistic when compared to historical growth rates. This inflates anticipated demand, meaning that money that could be spent fixing leaks and better managing the existing supply is instead spent on expensive projects that may never be needed. This raises customers' bills and saddles future generations with unfair repayment costs.
	Our Response	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

1. Oxfordshire area Individual stakeholder responses summary		
		<p>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>Customer bills are subject to a stringent Regulatory Review process and price determination under the control of the economic regulator, OFWAT and this includes proposed investments such as the leakage and trunk main schemes associated with the fWRMP19.</p>
	Summary of any change to our final WRMP	N/A
1.4	Representation	<p>The future reservoir option at Abingdon is particularly badly thought out. Thames Water and Affinity have sought support for this by pushing the idea that it is needed to reduce abstraction rates from over-stressed chalk stream and rivers. Understandably, this has attracted much attention from the river protection and angling lobbies. Yet it is clear from this draft plan that Affinity expects to meet the need to reduce abstractions by using water from the existing Grafham reservoir and that this will be achieved by 2025, before the reservoir is even started.</p>
	Our Response	<p>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.</p> <p>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. As the SESR is identified as the preferred option through the 'best value' analysis carried out for this WRMP, 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.</p> <p>The enabling actions that we identify for AMP7 in our fWRMP19 have been developed for the strategic schemes in alignment with the Business Plan process, and in particular our response to Ofwat's Initial Assessment of Plans (IAP), which requires such investigations as part of our AMP7 Business Plan.</p> <p>A core part of this process relates to the setting up of a 'gated' process, whereby the strategic scheme investigations are carried out jointly by the water companies involved, and the scope of works and decision whether or not to proceed to the next gate is scrutinised by the economic (Ofwat) and environmental (EA) regulators. This gated process will apply to all of the strategic investigations, and covers the enabling actions associated with the SESR, the River Thames to Affinity Transfer, the GUC transfer and the South Lincolnshire reservoir scheme.</p>
	Summary of any change to our final WRMP	Updated Chapter 6 and 7 of the fWRMP19.
1.5	Representation	<p>Despite being co-proponents of the Abingdon reservoir, it is clear that Affinity knows little about it. They have made no attempt to engage with the local communities or councils and have no understanding of the environmental effects, the problems of building over a floodplain or even its potential lack of sustainability.</p> <p>The scale / size of the reservoir is ridiculous. It would be a huge blight on the area and the 30+metre high walls beg belief. It will be an eyesore on the local landscape.</p> <p>The construction period is intolerable for local residents, especially when the local community will see no benefit from the reservoir. Currently there are no plans to create new infrastructure or to even improve an already overloaded and weakened existing</p>

1. Oxfordshire area Individual stakeholder responses summary

		<p>infrastructure in the area. Construction traffic will be coming through rural villages, increasing pollution, traffic, damage to local roads etc.</p> <p>The negative effect this will have on local property prices as a result of reducing the flood defences (so inherently increasing the flood risk to the area), construction traffic and the visibility of such a facility.</p> <p>This appears to be a revenue building exercise with little thought to location or actual justifiable need.</p> <p>There will be damage to the local environment and habitat, including loss of wildlife and farmland and impact on the ecosystem.</p> <p>Drawing the water from the Thames will put the pipework through a significant number of new housing which has not been considered. How will this impact the major artery of the A34?</p>
	Our Response	<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>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>Detailed quantification of any impacts on visual amenity, disruption during construction and any resulting impact on property prices are required to be addressed as part of the DCO application process, if the scheme progresses to that stage. Schemes are not analysed to that level of detail at this strategic stage of the process.</p>
	Summary of any change to our final WRMP	N/A
1.6	Representation	<p>Affinity's plan to purchase water from Thames Water is, in its current form, an incredibly bad deal for Affinity customers. We understand that for every 100 megalitres per day of water transferred, 70 or more will be returned to Thames Water since they deal with Affinity's waste water and sewage. Instead of paying for just 30 megalitres per day, customers will pay the full price for 100 and then pay a further bill to Thames Water to process the 70 megalitres per day they are getting for free as waste water.</p> <p>Similarly, water transferred from Grafham and the increased chalk stream flows, will largely end up available to Thames Water for free. This is not recognised in either the Affinity or Thames Water plans. Even using Affinity's own inflated figures, a source such as the reservoir is not needed until 2050. Recalculating demand and supply using sensible figures shows it is not needed in the 60-year horizon of this plan.</p>
	Our Response	<p><i>Charging and payment for wastewater.</i></p> <p>The wastewater charge paid by customers, once metered, is entirely independent of the source of water and relates to their consumption, and does not include any costs associated with spare supply capacity that is generated in our plan. Our investment plan is designed to help customers reduce their consumption and may therefore help to lower wastewater bills, although we note that wastewater is driven primarily by load rather than volume, so the effect is likely to be marginal.</p> <p><i>Impact on Flows and Yield for Thames Water.</i></p>

1. Oxfordshire area Individual stakeholder responses summary		
		<p>The position described in the responses does not reflect the complexities of the interactions between our proposed investment and Thames Water's yield. We have therefore updated our Plan to include a description of how our strategy might affect downstream flows in Chapter 4, and explicitly include a qualitative assessment of the risks associated with this, plus a requirement for conjunctive use modelling in the regional assessments under the Adaptive Strategy and Monitoring Plan sections in Chapter 6. We show that this may marginally increase the risk to Thames Water prior to strategic scheme development, but creates additional benefits for a strategic scheme. As part of the AMP7 regional investigations we will also facilitate system simulation modelling and hydrological analysis through the WSRE group to quantify the risks and benefits associated with changes in Chalk stream flows due to reduced abstraction and changes in effluent returns. We therefore acknowledge that there is an upside benefit to the SESR that may tend to increase the yield when it is considered as a shared resource, but we have been cautious on this point and have not yet claimed any increase in yield, partly because it cannot be quantified at this stage, and partly because we do not yet know how the EA may view water quality implications during licencing. We will take this into account during the further investigations and, if appropriate, development and cost sharing for the scheme.</p>
	Summary of any change to our final WRMP	Chapter 4 and 6 of fWRMP19 updated.
1.7	Representation	The Supply 2040 scheme is a good idea, but again badly implemented. Simply bringing this forward would open up a range of alternative supply options, including redistribution of surplus water available in some zones. This measure alone would mean a source the size of the Abingdon reservoir is not needed
	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>
	Summary of any change to our final WRMP	Technical Report 4.9 updated.
1.8	Representation	Affinity Water have made no attempt to engage with the local communities or councils.
	Our Response	In recognition of the changes that were made to the draft plan we undertook a period of further consultation for eight weeks from 1 March to 26 April 2019. The purpose

1. Oxfordshire area Individual stakeholder responses summary

		<p>of the further consultation was to provide an opportunity for regulators, stakeholders and customers to comment on the revisions that we had made to our draft plan and to seek endorsement of our proposals.</p> <p>We worked closely with our Customer Challenge Group (CCG) from the start of the rdWRMP19 further consultation process through the formation of a CCG sub-group. The CCG sub-group have reviewed the findings and feedback from our further consultation and engagement.</p> <p>We wrote to stakeholders and published details about the further public consultation and how to participate on our website www.affinitywater.co.uk/haveyoursay. We published the below documents on our website and made paper copies available to view throughout the consultation period, by appointment, at our Hatfield office.</p> <ul style="list-style-type: none"> • a non-technical document – this provided a summary of our revised plan in an understandable format • our full revised draft plan • draft plan Statement of Response (SoR) and an addendum to our SoR. • rdWRMP19 technical reports were made available upon request. <p>Consultees could make representations via an online survey, email or post and a paper feedback form included in our non-technical summary document.</p> <p>A comprehensive communications campaign was delivered through employing a wide variety of communication channels to ensure customers and stakeholders across our supply area and beyond were made aware of the further consultation.</p> <p>The majority of the responses (85%) to the further consultation online survey were from customers. Feedback from customers relevant to the consultation was also received through research and engagement activities conducted during the consultation period. This included an online representative survey of 1,000 customers and individual written feedback from Affinity Water customers, which was analysis independently by Ipsos MORI.</p> <p>We held a Stakeholder Assembly. The purpose of the Assembly was to enable stakeholders to contribute to shaping our future strategies. We also held meetings with regulators and other water companies both individually and through Water Resources in the South East (WRSE) and Water Resources East (WRE) groups and met with several key stakeholders including local authorities, GARD and environmental groups to present and discuss the rdWRMP19.</p>
	Summary of any change to our final WRMP	N/A
1.9	Representation	This plan should be completely rejected as being unfit for purpose.
	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.</p>
	Summary of any change to our final WRMP	N/A