



17 February 2023

Dear Sir/Madam

WRSE Consultation on the Draft Regional Plan for South East England

This is our response to the Consultation.

Introduction

This response covers the following points:

1. Information about the Wantage and Grove Campaign Group
 - Who we are
 - Where we are
 - Our interest in the Draft Regional Plan for South East England
2. Our feedback to the Draft Regional Plan for South East England including:
 1. How the draft plan addresses the scale of the challenge
 2. The demand for water by other sectors
 3. The balance between investment in new water supplies and reducing demand
 4. Collaboration between water companies
 5. Other comments

1. The Wantage and Grove Campaign Group

1.1. Who we are

The Wantage and Grove Campaign Group is a non-party-political group of over 1000 individuals who live in and around Wantage and Grove in Oxfordshire. We are not against any development in Wantage and Grove but:

- Developments should be proportionate and sustainable; and
- The infrastructure should enhance and improve quality of life for its residents.

1.2. Where we are

Wantage and Grove and the surrounding villages jointly comprised over 15,000 households at the 2021 census. We are situated in the centre of the Vale of the White Horse.

The Vale is a predominantly rural area located in south-west Oxfordshire and is bounded to the north and the east by the river Thames and to the south by the North Wessex Downs Area of Outstanding Natural Beauty (AONB). It is located between the larger centres of Swindon, to the south-west; Oxford, to the north-east; Newbury, to the south; and Didcot, to the south-east.

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1.3. Our interest in the Consultation

This plan affects us as residents of the area within the Vale of the White Horse living very close to the proposed site of the South East Strategic Reservoir.

2. Our feedback to the Draft Regional Plan for South East England

2.1. How the draft plan addresses the scale of the challenge

2.1.1. **Q:** Do you think the draft regional plan addresses the scale of the challenge we face in the future through our adaptive planning approach?

A: Strongly Disagree

2.1.2. Your plan fails to address the following issues:

2.1.2.1. Drought Resilience by the 2030's

Proper Drought Resilience is delayed until after 2040 because the South East Strategic Reservoir (SESRO) is started first and the Severn Thames Transfer (STT) is delayed. Most of the drought resilience could be achieved by 2034-5 if the STT were chosen first. BUT true resilience must include more urgently tackling leakage and improving Water Efficiency. Both are essentially climate independent, and in both cases Thames Water are the worst foot-dragging company. As residents of the Thames Water area, we do not understand why our target for water usage should be higher per household than the rest of the country?

As we stated in our response last year:

“The idea of improving resilience is supposed to be that you do something as quickly as possible. Your plan seems to be business as usual until 2040 and deliberately delays the introduction of schemes that could provide extra water more quickly. This is unacceptable.”

2.1.2.2. Net Zero Carbon

The government has announced ‘net zero’ Carbon target by 2050 and Oxfordshire Council has committed for Oxfordshire as a whole by 2050. So why does WRSE (specifically Thames Water) decide to embark on one of the largest industrial projects in Europe, with the largest construction carbon footprint of any Strategic Water project (TW's figures).

2.1.2.3. Outdated Population Forecasts

Population forecasts are overstated and do not take account of the latest government projections which show that the UK population will start falling as soon as the next 10-15 years, so planning for a huge increase in demand doesn't make sense.

Using forecasts based on ONS 2014 when ONS 2021 is available also doesn't make sense.

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2.1.2.4. A Plan which can be adapted

The plan is not adaptive – the STT pipeline would be much more flexible to changes in demand and changing population need and should be built first before the reservoir given the very large changes in population forecasts in the last few years.

The regulators asked for a plan that could be adapted over time, but this plan proposes construction of the largest infrastructure development (Abingdon Mega-Reservoir) right at the start so isn't adaptive at all.

An infrastructure project like the SESRO is not very adaptable. Unlike flooding a valley, this huge construction would take as long to remove as to install and the cost of removal would be similar to the cost of construction. The consequential damage to the area cannot be undone, without huge cost, once construction has started.

2.1.2.5. Landscape impacts

The landscape impact of the SESRO when compared with that of the STT has not been included in the plans and as residents of the local area we would be severely impacted.

Our estimate of the size of the reservoir is that as it would be built above ground it would be contained by bunds between 15 and 25 metres high. That's about the height of an 8-storey block of flats and higher than anything else in the Vale. The reservoir embankments would enclose about 4 square miles and be over 10 miles long and be the largest thing visible from the Ridgeway (in the North Wessex Downs Area of Outstanding Natural Beauty) or from anywhere else in the Vale of the White Horse.

The population of the Vale of the White Horse has grown by more than a third in the years since the reservoir was first proposed (particularly in OX12 and OX13 close to the reservoir – 20% in the last 10 years) and now the bunds will be within 500m of homes and it will dominate their landscape.

2.1.2.6. Environmental impacts

The plan fails to adequately show how the environment local to the reservoir site would be protected or, indeed, improved as required by law. Given that, in 2022, the upper Thames failed to sustain even existing reservoirs without requesting excessive extraction under drought permits, it is unclear how levels in the proposed new reservoir would be maintained.

We do not understand the reticence to prioritise the transfer of water via the STT to this severely stressed South East area from less stressed regions to the North and West.

2.2. The demand for water by other sectors

2.2.1. **Q:** Do you support us continuing to work with other sectors so our regional plan fully embeds their future needs and includes appropriately-funded solutions to meet them?

A: Strongly Agree

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- 2.2.2. Other sectors should be included as stakeholders at board level, in the same way as other Water Regions such as Water Resources East do. We believe that the solutions in the plan are designed to benefit water company shareholders rather than residents of the South East. This needs to be addressed.

2.3. **The balance between investment in new water supplies and reducing demand**

- 2.3.1. **Q:** Do you think the draft regional plan strikes the right balance between reducing the demand for water and developing schemes to provide new water supplies?

A: Strongly Disagree

2.3.2. Reduce Demand

More emphasis should be placed on reducing the demand for water.

As stated above, as residents of the Thames Water area, we do not understand why our target for water usage should be higher per household than the rest of the country.

Thames Water need to invest much more (and should have done for the last 30 years) in leak reduction and demand reduction. We do not understand why they should be allowed to continue to be the worst performing water company in the country. They should be required to meet the Government target for per capita consumption by 2050 and to meet the leakage targets of at least the next worst supplier (Affinity Water)

Why should their leakage target for 2050 be allowed to be twice the leakage rate per property of SES water?

2.3.3. Not a new supply

The construction of the SESRO does not add new water supplies to the South East.

Flow records show it would have been impossible to fill the SESRO between May 1975 and December 1976 (the '1976 Drought') so in a similar period in the future it would be a huge white elephant and of no use whatsoever.

2.4. **Collaboration between water companies**

- 2.4.1. **Q:** Do you support the increased collaboration between the water companies in the South East and other regions, through the development of shared resources and an enhanced network to transfer water around the region and between regions??

A: Strongly Agree

2.4.2. A National Issue

Water management is a national issue and there should be national resource management not self-management by groups such as WRSE. The need for regional transfers has been known for many years, yet nothing has been done.

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2.4.3. The Romans could do it

Your own literature points out that the South East is the driest part of the UK, so should be obtaining water from the much wetter and water rich parts of the country.

If the Romans could do it why can't we do it now (or more importantly why haven't we been doing it?).

Surely water supply is more important than HS2?

2.4.4. The Thames is at risk

In 2022 we saw the Thames headwaters dry up and move several miles downstream. We may face a period where future permitted abstractions are only a fraction of current levels due to environmental considerations, so this plan should show a start to the Severn-Thames transfer before 2030, and an advancement of the Grand Union Canal phase 2 water transfer before any consideration of building the SESRO is made.

2.5. Other Comments

2.5.1. Is this just a box ticking exercise?

You don't seem to have changed the plan presented a year ago based on any of the responses received so why should we believe that this is anything other than a box ticking exercise?

Are we just wasting our time participating in meetings and responding to consultation after consultation, with so many issues raised that have been simply ignored.

It is very hard to identify where changes have been made to plans because of consultations.

Table 1 of the plan gives responses which include words like "considered" or "assessed" but there appear to be few, if any, changes to the plan - so what exactly is the point?

Is this just a box ticking exercise so that you can say you have consulted?
Please listen to respondents and make the plan reflect their concerns.

2.5.2. Technical Innovation

Where in the plan is technological innovation?

After the recent reporting of large numbers of incidents of raw sewage discharges, water companies are going to have to invest heavily in better water treatment. This should reduce the amount of investment required to clean up the water for reuse in the system.

Why isn't this acknowledged more in the plan?

2.5.3. When Medium is less than 4% lower than High

Given the myriad of options which appear to have been considered as part of the planning process we struggle to understand how the reported pathway is less than 4% lower than the highest option.

Population forecasts do not take account of the latest government projections which show that the UK population will start falling as soon as the next 10-15

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years, yet this plan seems to suggest that population migration into the South East will exceed that of the entire country.

2.5.4. When Adaptive is not Adaptive

The “adaptive plan” is not adaptive because the SESRO (which is such a key component of this plan) will be built before the forecasts are tested. Once built the cost of dismantling the banded mega-reservoir will be similar if not higher than the cost of construction so how is this adaptive?