The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear [redacted]

CPRE Comments on: Gate one submission for South East Strategic Reservoir Option (SESRO)

CPRE Oxfordshire would like to express our severe concerns about the quality and conclusions of the Gate 1 submission for the South East Strategic Reservoir Option. We feel the report fails to explain the logic behind its conclusions nor much of its methodology. This makes it difficult to critique in detail. However many of its conclusions, for example the assessments of biodiversity damage, see below, are perverse, leading us to concludes the assessment has either been superficially produced or deliberately biased.

We thank you for extending the very tight deadline but urge that the subsequent Gate 2 consultations are given sufficient time and access to underlying documents to allow the in depth analysis this massive proposal deserves. We appreciate that this is a highly complex and multi-faceted assessment and would suggest that a truly independent analysis of these documents is commissioned.

Biodiversity Damage

The SEA assessment (table 5) accepts there will be 'moderately adverse' impacts on habitats and species within reservoir footprint and across nearby county wildlife sites during construction, and on the surrounding water courses during operation. This seems a considerable understatement! The reservoir footprint will be completely trashed during construction and in subsequent operation (i.e. it will be submerged!). If that was not enough the noise, dust and light pollution generated by construction will have a considerable impact on the surrounding wildlife (and residents). The assessment goes on to suggest the biodiversity impacts will be 'major beneficial': '*delivered through a commitment to Biodiversity Net Gain and the provision of habitat creation, including grassland and aquatic habitat of a higher nature conservation value than those lost*'. The biodiversity net gain clearly cannot be delivered on the footprint of the proposed reservoir can only be achieved through remote offsetting. This should be clearly stated. Academic reviews show remote offsetting rarely delivers on its promises[1]. Indeed Dieter Helm, the Chair of the Natural Capital Commission, Nov 2019, states: *'No-one has yet achieved net environmental gain at scale'*. Even if it were to work it is a long term process – taking many decades to develop a 'natural' rich grassland, for example.

We would suggest the biodiversity impact is severely damaging and the plan should explicitly state the offsetting can only be remote and needs to identify the considerable risks to this approach.

Carbon Impacts

The assessment accepts there would be very high construction or embodied carbon emissions associated with this project. The hope that these could be mitigated (para 2.8) by low carbon earth moving machinery and EV charging points (para 5.18) is illusionary. It is highly unlikely that heavy goods vehicles and earth moving machinery will be electrified in the next two decades nor hydrogen powered machinery (not to mention the large-scale production of green hydrogen). We would also question whether the full supply chain has been accounted for, both in the carbon emissions of quarrying and associated environmental damage – for example the quarrying, production and transport emissions of the concrete, riprap, sand and gravel. I would remind you that by the 2030s the UK needs to be well on our way to a zero carbon economy and, of course, public companies should be at the vanguard of this endeavour. Is this proposal consistent with a zero carbon Britain?

[1] Zu Ermgassen et al, 2019. Conservation letters. Doi 10.111/conl. 12644.

A thorough and transparent carbon impacts assessment needs to be made before this scheme can progress.

Landscape

The assessment accepts there will be 'moderately averse' impacts during construction – this is almost certainly an understatement! as with biodiversity, we would suggest these impacts would be severe. Let us not forget this construction is seven square kilometres with embankments 25 metres high. This will be clearly visible from the iconic Berkshire Downs, part of the North Wessex Area of Outstanding Natural Beauty, and within a few miles of the White Horse. The massive impact on local settlements seem to have been ignored completely.

The SEA goes on to state the operational impacts will be 'moderately beneficial' , this is impossible to believe even with '*Landscape-led design and mitigation strategy ensure embedded mitigation, good environmental design integration, and an environmentally sustainable development that will contribute to an overall improvement in the landscape surrounding the reservoir*' – whatever that means in practice? We should also not forget the construction will last for 10 years and the establishment of the landscaping trees and vegetation will take many decades after this to establish – this will look like an industrial site from the AONB for many decades.

An honest and independent assessment of the landscape impact needs to be undertaken before this scheme can progress.

Air and noise pollution and traffic disruption

Construction impacts on local people and businesses are covered only briefly in Table 11-12 and 11-13 of the EAR report as part of the so-called 'Social Capital assessment'. This appears to be the only assessment of the impact of this huge construction project on local people and businesses. The EAR report (Natural Capital Assessment 31 Full Report) provides no detail whatsoever on these construction impacts. Instead, it focuses on assessing the supposed benefits. For example, Table 3-8 shows air quality has a positive benefit through absorption of pollution by vegetation on the reservoir embankments. There is no assessment of the dis-benefit of 10 years of excessive diesel fumes and dust, and its subsequent effect on their health and the NHS. There is further no assessment of the detrimental effect on pollution absorption of the loss of over 4 sq. miles of vegetation.

CPRE proposes that in Gate 2 there should be detailed investigations of traffic, noise and air pollution impacts during construction, with design and costing of mitigation measures.

Impact of the reservoir on flooding

The Gate 1 report suggests the latest flood modelling shows the reservoir would lead to a reduction in flooding. The situation is not improved by the release of the un-redacted EAR from 29th October, here there are only minor references to flooding, for instance in the sections on 'Natural Capital': in flood risk for Abingdon. This seems an unlikely conclusion. The loss of a considerable part of the flood plain of the Ock, which provides considerable storage and slowing down of any flood wave to be replaced by a body of water, which could respond very quickly to an inflow of water, seems to have the potential to increase flood risk. To provide a reduction of flooding in the Thames valley the reservoir would have to be actively managed for flood prevention – there is no evidence this has been planned for (and how it would impact on the primary purpose of the reservoir – water supply). We would add that in a recent survey of Parish Councils undertake by CPRE a large percentage of respondents reported flooding problems (see https://www.cpreoxon.org.uk/news/item/2888-cpre-oxfordshire-flooding-and-pollution-report). This finding suggests any major landscape engineering needs to proceed with extreme caution.

CPRE urge that more detailed of flood impact assessments should be made (and made available) as part of Gate 2. These should include the impacts on local villages, as well as impacts on Abingdon and the Thames valley, and the management rules of the reservoir.

Risk

A major risk is omitted from the risk register (table 10) – this is the risk of the storage scheme of not performing. Table 7 identifies a number of hydrological scenarios, the most extreme drought scenario accepts that the reservoir 'would

likely be empty (or nearly empty) by the end of a 24 month severely dry period'. We would suggest that there is every chance that an extended dry period could extend for more than 24 months, indeed this happened in the 1890s. We understand the hydrological modelling uses a very limited period to develop the stochastic time series – from 1951 to 1997. This thus excludes the extended droughts in the 19th century, 1920s, 1930s and 1940s, in addition to the last 20 years, which has seen increasingly variable weather. This scheme would clearly fail if a drought extended for more than 24 months.
There needs to be a more detailed, hydrological analysis, using longer records, of the risk of resource failure if this option is to progress.

Public Opinion
We feel this discussion of public opinion is duplicitous and the position to this scheme under-stated. The answer from the public will depend on the question asked. If the full facts are laid out, i.e. the development of the reservoir will involve drowning a huge area of countryside and destroying a number of communities a very different answer will be given.

Local communities have been vehemently opposed this development for decades (and it was rejected by a public enquiry in 2010). We note also the local Councils are all opposed to this development. This is unlikely to go away with increased explanation – we would suggest that after 20 years of opposition the local communities are very well informed about the dis-merits of this scheme. The risk register underestimates the likelihood that this development could be severely delayed by local opposition.

The risk register needs to be realistic about the considerable opposition to this scheme across Oxfordshire

Yours

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Chair, CPRE Oxfordshire.