

Regulators' Alliance for Progressing Infrastructure Development
rapid@ofwat.gov.uk

Date: 5 October 2021

Our ref: [REDACTED]

Your ref:

Dear Sir or Madam

South East Strategic Reservoir Option

This representation is made on behalf of The Earl of Plymouth Estates Limited in relation to RAPIDs draft decision in respect of the South East Strategic Reservoir Option (SESRO) gate one assessment sponsored by Thames Water and Affinity Water.

Our client [REDACTED]

[REDACTED] Lichfields and [REDACTED] (of H2O WEM Ltd) submitted detailed objections on behalf of our client to the draft WRMP 2019 in April 2018 a copy of which is attached.

It is unclear from the information available how these objections have been addressed by the sponsors. In summary, we raised in relation to:

- a Unsuitability of the Abingdon solution given:
 - i Its distance from the point of demand for this water;
 - ii An open reservoir not being the best solution for water storage given the predicted increase in hot weather and drought;
 - iii Inadequate analysis of costs of delivery.
- b Inadequate consideration given to environmental and social needs:
 - i Environmental impacts have been understated;
 - ii Need for new housing and employment within the local area.
- c Flawed consideration of other options:
 - i Insufficient analysis of water transfer; desalination; groundwater or water re-use;
 - ii A series of smaller reservoirs closer to points of demand;
 - iii Failure to engage with landowners;
 - iv Insufficient attention to reducing supply side leakages.
- d Overstated water deficit

- i Insufficient account in terms of technological advances in water treatment technology; energy generation and water saving appliances;
- ii Object to references to selling on water to neighbouring water companies as this brings into question whether the reservoir is needed.

We note that GARD issued an initial response to RAPIDs standard gate one draft decision for SESRO on 7 August 2021. Lichfields has reviewed this document on behalf of our client and support the central concerns raised by GARD in their report.

On behalf of our client we request that more detailed consideration is given to the alternative options to plan more effectively for water resources instead of SESRO.

Yours faithfully



Senior Director

Copy: Earl of Plymouth Estates Ltd, c/o Cooke & Arkwright, 7/8 Windsor Place, Cardiff, CF10 3SX