

RESPONSE TO GATE 1 SUBMISSIONS AND DRAFT DECISIONS (SESRO)

OXFORDSHIRE SOUTH AND VALE GREEN PARTY

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Summary

This document is our representation to the RAPID Gate 1 submission report by Thames Water and Affinity Water for the South East Strategic Reservoir Option (SESRO), and the draft decision. It focuses on the main issues that we think RAPID need to ensure the companies address ahead of Gate 2.

In 2010, a public inquiry concluded that Thames Water’s plan for a reservoir in the Vale of White Horse outside Abingdon had not made a convincing argument for the need for a reservoir, and had not fully evaluated other options. Ten years later, this new proposal, now in partnership with Affinity Water and rebranded as SESRO, returns an even bigger project to the table, of up to 150 million cubic metres.

The South East is the most water-stressed part of the UK, with the whole of the south of England at risk of water shortage by 2065 under some climate change scenarios. These risks of drought certainly affect Oxfordshire, However, while the Thames Water WRMP (2019) proposed that SESRO would “capture and store water falling on the wetter west of our region to meet the growing needs of Swindon and Oxford” (p.8) this proposal is silent on this ambition.¹ It is clear that a reservoir in the Vale will not benefit our area. Instead, it will continue to cater to – and drive – high water demand in London.

¹ <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

This Gate 1 submission is not transparent, and fails to address key issues at even a basic level. Central claims and assumptions - not least on financial cost and environmental impact, including flood risks - are not sustained by evidence. Discussions of losses and benefits underplay the negatives and overplay the possibility of mitigations. The proposals are inconsistent, vague, and in many elements have yet to be researched. This submission does little to adapt or advance a case that has already been rejected as without need and does not take full genuine account of alternatives.

We believe that in order to meet the future water needs of the region, priority must be given to major demand management measures, investing in existing infrastructure, preventing the enormous wastage that occurs through leaks, and reusing water wherever possible. Clear improvements must be made in all these areas before a need for SESRO can be convincingly demonstrated, particularly when there are a number of other large-scale options to be considered.

We outline our main points further below, and we look forward to seeing these rectified at Gate 2.

1. Process Transparency.

Even at Gate 1, this process has been deeply flawed. At a time when water companies' reputations are deeply damaged, this initial step in the gated process has not inspired confidence.

The initial deadline of 8 October for responding to Gate 1 submissions has quietly been extended twice, first to 29 October, and then to 19 November. This second extension was confirmed extremely late and after many stakeholders may have submitted their responses.

Information on the Affinity Water website page hosting the SESRO documents remains out-of-date (18 November) even in relation to the first deadline change, let alone the second in early November.²

This is not a minor issue. The government's 2021 WRMP Guidelines (para 1.1.1):

“You should be transparent through your methods, data, assumptions and decisions to achieve customer, stakeholder, regulator and government support for your plan. This is essential so that all interested parties can debate and influence your plans.”³

² <https://affinitywater.uk.engagementhq.com/strategic-resource-options> (viewed 18 November 2021)

Far from being transparent, this initial consultation has been entirely opaque. Most worryingly, the revised consultation date was made necessary in response to criticism by organisations, including Oxfordshire County Council, of redacted information in the initial public documents. In particular, figures illustrating various possible project locations and sizes had been removed from the Environmental Impact Assessment (EIA) (now reinstated).

It is precisely this information that local communities and organisations require access to in order to judge the potential effect of any proposals on communities and environment. To only make such information available after initial advertised deadlines have passed is unacceptable, and renders the exercise meaningless.

It is RAPID's job to ensure that future submissions from Thames and Affinity Water are provided to the public in line with WRMP guidelines, and contain all the information required to make informed, evidence-based decisions.

Local residents have faced these reservoir plans since the 1990s, including through the process of the 2010-11 public inquiry. Individuals, families and whole communities have long been and will continue to be directly affected by this project, with no prospect of benefit to our own water needs in the district after a decade of construction disruption.

2. Ambiguous and vague language re social and environmental impact

This enormous project has real and alarming potential to fundamentally reshape a number of entire communities in the Vale of White Horse, most notably the villages of Steventon, Drayton, Marcham and East Hanney, home to several thousand residents, as well as agricultural properties within the footprint. It will permanently alter the connectivity, ecology and agricultural productivity of an entire district.

Throughout the main document, a language of uncertainty and potentiality plays down the very real environmental, physical and social risks from the project. The words "may" and "could" appear frequently with no indication of how serious these aspirations or threats may be. These include how to mitigate the loss of waterways or floodplain, and the kinds of construction materials that might reduce the carbon footprint of the construction.

It is not clear how "moderate adverse" effects have been justified, such as when these refer to a decade of construction disruption to residents, and the permanent loss of "residential and

³ <https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline>

commercial properties, transport infrastructure and energy and community facilities within reservoir footprint” (Table 5). No mitigation for this loss has been identified (5.8). While the ambition to reduce reliance on HGVs by utilising the railway line is welcome, the majority of paths identified appear to only be available at night when noise and light pollution would be most disruptive to residents along the line.

By contrast, the potential to create leisure amenities is rated as “highly beneficial”, when the feasibility of including such amenities is thrown into significant doubt by the INNS report.

Information must be honest, accurate and transparent. Proposals must take full account of the pros and cons of the different options available nationally, regionally and locally, and not skew the language to push the “preferred plan”.

3. Flood Risk

On the basis of better modelling, the submission claims a slightly-reduced risk of flooding for Abingdon (Table 3), rather than the increased risk previously calculated. Abingdon regularly floods, including seriously in 2007 and 2014. With climate change these floods will become more frequent and more extreme, yet a flood-defence scheme for Abingdon has been dropped as unviable.⁴ It is absolutely critical that all information about flood risk, the basis of the calculations, and the assumptions that are being made about future climate scenarios, are made public.

4. Biodiversity Loss

Habitats are not just important when they are irreplaceable or of special scientific interest. Land use change is the biggest cause of biodiversity loss in the UK, which is one of the most-nature depleted countries in the world.

Throughout, the submission document and the EIA (Chapter 12) discuss “biodiversity net gain” as a measurable. But biodiversity cannot simply be added and taken away like Lego bricks so that a box can be ticked. The predicted biodiversity loss on waterways of up to 50% cannot be offset or compensated for by unrelated schemes in other areas to create a marginal “gain” of up to 10% (which, it should be noted, is the very least that is required for Nationally Significant

⁴ <https://hansard.parliament.uk/Commons/2021-02-24/debates/58D02CC8-5626-4FE3-902A-CD4B44920CFD/OxfordWestAndAbingdonFlooding>

Infrastructure Projects within the Environment Bill). Mitigations and new habitats need to be expert-driven, effective and long-term. Any new habitats need to be permanently protected, managed and resilient to climate change. According to the EIA (p.224), “the WRSE assessment indicates that the current designs do not compensate fully in kind for loss of woodland or floodplain wetland mosaic grassland.”

This current proposal over-emphasises potential gains, and underplays obvious and permanent losses. Assessments of river condition are based on Google Earth imagery, and hedgerows and trees that would be lost have yet to be quantified (EIA, p. 219,221). The impacts of roads, tracks and pipelines are not yet included. The submission gives no indication of how assessments of biodiversity gain or loss are to be verified or monitored in the long term by independent ecologists and other specialists.

5. Water Quality

When dealing with risk, the precautionary principle must be employed.⁵ It is concerning that high hazard scores in the water quality risk assessment are dismissed with the blithe assertion that “nothing was identified that cannot be controlled.” (2.15) Such confidence begs the question of why water companies are currently so unable to control factors such as sewage releases, with such a profoundly detrimental impact on the quality of so many of our waterways?

As we write this, water companies, regulators and government are facing an Environment Agency investigation into unpermitted sewage dumping into streams and rivers. This situation, along with the unacceptable year-round practice of “spilling” raw sewage through storm sewers, is the result of decades of underinvestment in the water system.

This context is directly relevant to the SESRO proposal. In the Witney constituency - covering a large area of the Thames catchment directly upstream of SESRO - Environment Agency data reveals that raw sewage was spilled into streams and rivers for 18,621 hours in 2020.⁶ Fairford, Witney and Lechlade are major - but by no means the only - sources of regular and prolonged releases of untreated sewage from storm overflows into the Thames catchment upstream.

Algae is noted in passing as a potential risk (5.26), but there is ample evidence that water contaminated with sewage is likely to develop algal blooms, particularly in slow moving or still bodies of water such as lakes and reservoirs. Unless Thames Water radically improves this

⁵ [https://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_IDA\(2015\)573876](https://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_IDA(2015)573876)

⁶ <https://top-of-the-poops.org>

situation, the water going into the reservoir, if left untreated, is demonstrably not going to be “fresh”, particularly after rain. At this moment in time, the idea that abstraction can be timed (5.27) to avoid drawing poor quality water from the Thames is, unfortunately, laughable.

6. Cost

There is no transparency or even basic detail about the costs involved in different aspects of this project, or how the single figures provided in Table 11 were calculated. Nor are there any comparative costs with other strategic resource options. This must be rectified for Gate 2 with detailed breakdowns, and significantly more intelligible explanation than the jargon presented here.

7. Site Selection

The submission states (4.1) that alternative reservoir locations were rejected because they “did not have a choice of water sources, all needing to make use of the River Thames”. But the SESRO plan as set out here (4.4) *also* relies entirely on abstraction from the River Thames to the south of Abingdon. Thus, the current selection of SESRO to the exclusion of other locations cannot be justified on this basis.

8. Carbon Footprint

The embodied carbon footprint from the construction phase of this project is huge, with over half released during earth-moving. We are learning more and more about the significance of soil carbon sequestration, and the negative effects of disturbance.⁷ This growing evidence has to be taken extremely seriously in the light of climate and ecological emergency.

We were pleased to see energy recovery being considered at this stage. However, the reservoir will displace one large solar farm (just north of the current Hanney Road) and at least partially displace another (north-east of East Hanney). We would expect floating solar to be considered seriously within the planning process for this project - both in order to better utilise the ground area, but also to help counteract the carbon cost.

⁷ <https://www.fao.org/soils-portal/soil-management/soil-carbon-sequestration/en/>

9. What are the Alternatives? Reduce Demand, Reduce Loss, Reuse Water

Nationally, we need a solid water demand management strategy in place, as well as a strategy concerned with supply in order to meet the challenges of the twenty-first century. This includes routine effluent reuse, constraining consumption, developing sustainable irrigation in agriculture, rainwater harvesting, greywater systems, measurement and prevention of losses, an environmental perspective on water subsidies, monitoring of health risks and benefits, and the development and consistent implementation of a Water Demand Management plan.

Most importantly, water companies must be made accountable to the public who have no choice in supplier. Profits need to be channelled into investment, not the pockets of shareholders. The profit expectations built into the SESRO proposals must be made clear.

SESRO is proposed in the context of an array of alternative “Grand Schemes”. The Severn Thames Transfer scheme appears a viable alternative as a cheaper, less disruptive, more resilient and adaptable solution. However, the Severn Thames Transfer scheme is also problematic, insofar as it increases the risk of pollution events from outside the Thames catchment area, facilitates the spread of invasive non-native species between catchment areas, and because of the increased likelihood of reduced water flows arising from coincident drought events in both the Severn and Thames river system areas. Ongoing environmental stressors such as nutrient overloading in the River Severn system are of concern, and would be exacerbated by water transfers. The effects of water transfers on sensitive biota such as diadromous fishes and on sensitive habitats such as the Severn Estuary SAC need to be assessed.

If the point of the SESRO project is to harness water for the use of London, then the option to transfer water out of the Thames into Southern Water (in order to make profit) cannot be seriously considered.

10. Conclusion

Climate change is happening fast. Water companies must focus on fixing their house by reducing demand, reducing waste, and upgrading existing infrastructure. If new developments can then be justified, they must be adaptable, resilient and fit for a climate future that is certain to change. For the same reasons, the case for new infrastructure such as SESRO must be entirely transparent, clear and evidence-based if it is to justify the enormous disruption caused by a decade of construction, permanent habitat, community and landscape loss, huge carbon footprint, and potential flood risk.