

7 April 2022

Paul Hickey
Managing Director
RAPID
Centre City Tower
7 Hill Street
Birmingham B5 4UA

By email only

Dear Paul,

Mendip quarries – Representations on draft gate one decision

Thank you for the gate one decision document and letters published on 1st March 2022. This representation is on behalf of the two solution partners: South West Water (SWB) and Wessex Water (WSX).

We are delighted you have agreed that the Mendip quarries strategic regional water resource solution can join the gated process as a new solution. We are pleased to see that the gate one submission was assessed as good (meets expectations) and that you have allowed additional ring-fenced funding for development of the solution.

Our main representation relates to the gate two submission date. We are also responding to the priority actions that you have asked us to address during the representation period.

Gate two submission date

We request that for this new solution the gate two submission date is changed to 6pm on 10th April 2023.

In our gate one submission (section 15 page 36) stated that it would be beneficial to have a short delay to the gate two submission in order to allow a longer time period for project development, given that this is a brand new solution with initial studies having only commenced in 2021.

Our reasons for requesting a change to the submission date include:

a) Project milestones based on project need

In section 3 of our gate one submission, we set out a programme for development of the project. The current selected quarry site is not available until around 2040 +/- two years. Therefore, we proposed a project timeline based on the project's needs and constraints rather than one governed by fixed milestones. A short delay to the gate two submission date would allow more time for the technical studies required to confirm scheme feasibility and would not affect the overall development programme shown in Figure 3.1 of the gate one submission.

b) Alignment with WRMPs and Board dates

The timetable for Water Resource Management Plans (WRMPs) and regional plans includes the following key dates:

Date	Activity
July 2022	Papers to company Boards seeking approval of the overall draft plan
Sept 2022	Board papers requesting sign off of the draft plan submission
Oct 2022 (date TBC)	Draft WRMP submission deadline
14 Nov 2022 – 20 Feb 2023	Consultation on draft WRMP and next version of Regional plan
Early May 2023	Publish statement of response on draft WRMP and summary response on Regional plan (following receipt of permission to publish from Defra)
Jul/Aug 2023	Permission to publish final WRMP

Analysis for the draft WRMPs is underway at the present time, in order to feed into preparation of the plan in May/June 2022 prior to submission to the company Boards in July.

Therefore, with regard to this project the draft WRMP will be based on the gate one report, as there is insufficient time to complete any additional technical work before the draft WRMP is finalised in May/June 2022.

For an SRO submission date of April 2023, we will have completed technical work by February, which would enable any updates to be fed into the statement of response and draft final WRM in May 2023.

Company Boards are bi-monthly in January, March, May, July, September and November. Wessex Water Services Board is in the last week of the month and South West Water Ltd is normally in the middle of the month. Audit and risk committee meetings are generally just prior to board meetings. Therefore, for a November submission date work needs to be completed and assured by September, whereas for an April submission date the relevant Board date would be much closer in time in March.

An April 2023 submission date provides a much greater opportunity to have completed substantive gate two studies and still factor the results into the final draft WRMP and Regional plan.

c) Second SRO Pathway

We see merit in establishing a second pathway for a group of strategic resource options (SROs). The original set of 17 strategic resource options promoted in 2019 were put on an ambitious programme in order that the preferred projects, as selected through the regional plans, were construction ready in the period 2025 – 2030, with three projects put on even more accelerated programme to potentially address the pressing needs in Hampshire. The reality is that the regional plans indicate that there are several projects that are not required to commence construction in the period 2025-2030 but they do need continued enhancement funding and regulatory support so that more certainty can be provided in the next round of regional plans. Their development will continue into the next AMP and funding will need to be included at PR24. Mendip quarries is in this category of solution.

d) Hydrogeology / Groundwater modelling

In our gate one report we indicated that one of the key technical studies required was further groundwater modelling of the quarry site. There is an existing lumped parameter spreadsheet based ground water model for the East Mendips area (known as EMMv1). We plan to use this model to consider the impact of drawdown on local water bodies and other abstraction sites. Agreeing the licence arrangements with the Environment Agency and obtaining the model and relevant data has been rather protracted, with the model only finally received on 31st March 2022. However we are confident that we will be able to mitigate the delay to the first phase on our gate two work.

In addition, there is an ongoing project to update the groundwater model for the East Mendips to a MODFLOW model. This project is scheduled to complete around July 2022. This is too late to be useful for a November submission, but it could be used to inform a second phase of modelling within a gate two programme that extended to April 2023. The advantage of using the revised model is that our assessment will be based on the same model that the Environment Agency (EA) are using to assess planning applications for new quarries and with consistent data.

e) Most effective and logical sequence of activities

To maximise the option development during gate two, a logical sequence of activities is recommended, as outlined below.

- 1) Refinement of need. Reviewing the need in terms of the forecast deficits in receiving Water Resource Zones (both within WCWR and WRSE) including understanding both the magnitude and duration of the deficits under different scenarios (particularly for the Environmental Ambition)
- 2) Groundwater modelling. As described above, a key part of increasing confidence in the feasibility of using quarry sites for water storage is better understanding of the hydrogeology of each site and the potential leakage rates.
- 3) Conceptual design. Following an updated statement of need and revised capacity envelopes, the different scheme elements can be defined and capacities chosen that will allow the needs to be addressed across the range of future scenarios. At this stage the water quality risk assessment, WFD and INNS assessments can also be used to inform the treatment concept design.
- 4) Cost estimating and environmental assessments. As conceptual design is completed on scheme elements then work on cost estimating and environmental assessment can proceed.

If these activities are not undertaken in this sequence then there is a significantly greater risk of rework being required. Working back from a November gate two submission date would require assurance work to take place in July and August 2022, meaning that all the activities listed above would need to be conducted by July 2022. This leaves very little time for gate two investigations to further develop the scheme and risks incurring repeat work and inefficient expenditure. An extension to the gate two submission to April 2023 would allow the scheme to be substantially further developed and for activities to be progressed in a logical sequence, reducing the risk of rework and delivering better value to customers.

Priority actions

The draft decision document included two priority actions to be addressed during the representation period. Our responses are as follows:

1. Action plan for engagement with local stakeholders

There are well established arrangements for liaison between the quarry companies and the residents in the Mendips.

For the main quarry under consideration for this project the quarry liaison committee meets twice per year in March and October, with the option to call extraordinary meetings when required. The meetings are chaired by a councillor from Somerset County Council. Attendees include local and county councillors, parish councils, the EA, environmental health officers etc. Our plan is to arrange for an extraordinary meeting in June to brief the committee on this project. Meetings are evening meetings.

Fixing the date for the meeting is complicated by the change to a unitary authority and the local government elections in May.

Government has confirmed that Somerset's five councils will be replaced by a single council delivering all council services to communities in the county, with the new council fully operational by April 2023.

There are elections for councillors for the new Somerset Council on the 5th of May 2022. Elections will also be held on the same day for all parish, town and city councils across Somerset.

This means that it will not be possible to meet in the month prior to the elections and in the period just afterwards. Also the chair of the quarry liaison committee may change during this period.

Other local liaison groups include the East Mendip groundwater model liaison group, and the regular meetings we have already arranged with the EA and Natural England.

Our action plan for engagement with local stakeholders before gate two is included overleaf in Appendix B.

In addition, we will continue to brief the West Country Water Resources Group steering group and board meetings, which include representatives from various local stakeholders, such as the Mineral Products Association and the National Farmers Union.

2. Confirmation of liaison with drinking water quality teams

We recognise that one of the requirements of the assessment of drinking water considerations is the engagement with drinking water quality teams. There was engagement with drinking water quality teams during the gate one preparation but we omitted to mention the engagement in the gate one report.

In order to address the specific priority action a meeting was held with representatives from the drinking water quality teams at Wessex Water and South West Water on 31st March 2022. The main purpose was to update them on progress and set out the proposed methodology for the more detailed assessment to be carried out during gate two. A summary of the meeting is included in Appendix A for information.

Further meetings will be held as the project progresses.

We look forward to discussing the project at our first checkpoint meeting with you scheduled for the 4th of May 2022.

In the meantime should you have any questions arising from our representations please do not hesitate to contact us.

Yours faithfully

Julian Welbank
Programme Director – Strategic Resource Options for West Country Water Resources
Group

Copy to:
Paul Merchant – South West Water
Paul Saynor – Wessex Water

Appendix A - Liaison with drinking water quality teams

Meeting held on 31st March 2022

Attendees

Wessex Water – [REDACTED] (SRO Programme Director), [REDACTED] (Deputy Water Supply Regulations Manager)

South West Water – [REDACTED] (Regulatory Scientist)

Mott MacDonald – [REDACTED] (Technical Principal), [REDACTED] (Project Manager), [REDACTED] (Graduate Process Engineer), [REDACTED] (Graduate Process Engineer)

Scope and discussion

The meeting was held between Mott MacDonald, the principal technical consultant working on the Mendip Quarries SRO drinking water quality studies, and water quality representatives from Wessex Water and South West Water. In this meeting, Mott MacDonald briefed the water quality teams on the work completed so far in the RAPID Gate 2 process and the strategy for completing the drinking water quality assessment (DWQA) in line with the All Company Working Group (ACWG) methodology. The following discussion points were covered:

- Mendip Quarries SRO overview
- DWQA methodology overview including a description of the ACWG-approved water quality risk assessment (WQRA) process
- Data collected so far and data gaps to be filled to allow completion of the WQRA later in Gate 2
- Agreement on the assessment team to be present at the WQRA workshop later in Gate 2
- Timing of communicating DWQA updates with the DWI.

Actions

The following actions were agreed and assigned:

- Provide a contact for a water quality expert to represent Bristol Water at the collaborative WQRA workshop
- Extend invitation to Bristol Water for the Gate 2 WQRA workshop as they may be impacted by the SRO
- DWSP to be provided for abstraction, conveyance, treatment, and distribution stages associated with abstraction at Longham on the River Stour through to treatment and distribution from Alderney WTW
- Drinking water quality scoping report to be returned to Mott MacDonald with agreement from Wessex Water on DWQA strategy. Introductory communication with the DWI to then be made
- Presentation to be circulated.

Appendix B – Engagement plan

Group	Attendees	2022								
		Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Local stakeholders										
Quarry liaison committee	Somerset Council (chair) District council Parish council EA Quarry owner			16 June (TBC)					TBC	
East Mendips groundwater model liaison group	EA EA's modelling contractor (Wood) Independent reviewer Quarry owners Mendip quarry producers group Water companies West Country Water Resources Group / Mendip quarries SRO Programme Director		Date TBC		Date TBC					
Environment Agency and Natural England	EA's National appraisal unit and area team Natural England	20 th	18 th	15 th	20 th	17 th	21 st	TBC	TBC	TBC