

Ofwat
RAPID Team
Centre City Tower
7 Hill Street
Birmingham. B5 4UA

BY EMAIL ONLY

11 May 2023

Dear Sirs

Strategic Regional Water Resource Solutions: Standard Gate Two Draft Decision for North West Transfer

Thank you for the opportunity comment on the Standard Gate Two Draft Decision for the North West Transfer solutions. Our representation is set out below.

About Mersey Rivers Trust

Mersey Rivers Trust (MRT) is a charity and a member of the Rivers Trust movement. It is the rivers trust for the whole of the Mersey Basin catchment which includes some 5 million people across Greater Manchester, Merseyside and most of Cheshire. Our aim is to work with local communities and a wide range of stakeholders to improve river health for people and wildlife.

Our Representation

For clarity, we are happy for our representation to be published and shared as appropriate: there is no commercially sensitive information in this representation.

Our representation focuses on those elements of the North West Transfer that affect the River Mersey catchment. We have cross-referenced to relevant sections, tables or diagrams in the published Draft Decision document where applicable.

Our comments set out below are consistent with our representation made in March 2023 to the Secretary of State on the draft United Utilities Water Resources Plan 2024 (WRMP24).

1. Whilst **we agree with the draft decision** that development funding should continue to be provided for the North West Transfer (hereafter abbreviated to “NWT”), we have several key comments on the Draft Decision and some specific significant concerns that we request should be addressed during the next stage of solution development work.
2. Table 2: we are **concerned at the timescales** for some new water source elements of the NWT solution to be “construction ready” by 2027. For reasons set out further below, we do not consider that some of the new water sources proposed can be “construction ready” by 2027 due to the time required for the necessary investigations, assessments and permissions required, none of which have yet been progressed to any level of detail as at May 2023.

3. Table 2: we are concerned at the inclusion of some new water sources as set out in the NWT solution and the draft WRMP24, namely:

- **River Irwell direct river abstraction scheme**
- **River Bollin direct river abstraction scheme.**

Our view is that neither of these direct river abstraction schemes should have been included in the preferred plan of the United Utilities draft WRMP24 due to their environmental impact and the substantial chemical pollution risks for each river. Other water sources should have been considered instead to provide the necessary volume of reliable water supply. More details are provided in our representation on the draft WRMP24 (attached for ease of reference and to avoid duplication here).

For clarity, we do not have any particular concerns about the other water source schemes included in the NWT solution which involve groundwater abstraction.

4. Table 2: for the reasons cited above, we **do not agree** that the NWT solution as currently scoped provides the best value solution to address national water resources challenges, and that other water sources should be considered in place of the River Irwell and River Bollin direct river abstraction schemes.
5. Table 2: **We agree** with the assessment that “outstanding concerns remain around stakeholder engagement, environmental assessments including Water Framework Directive (WFD) compliance [and] water quality monitoring...”. In particular, we are disappointed at the lack of stakeholder engagement about the NWT Solution. We have asked for a detailed stakeholder meeting with United Utilities to enable greater dialogue but we have not had any response since an initial meeting that followed publication of the draft WRMP24. As the Rivers Trust for the Mersey Catchment, we are very keen to have an open dialogue with United Utilities to discuss our concerns and understand the scope of environmental and water quality studies.
6. Section 3.3: **we agree** that any underspend to date should be carried forward to allow a greater level of investigation of the NWT Solution.
7. Section 3.4: **we agree** with the “areas falling short of expectations”. In particular, we would highlight:
- a. Stakeholder engagement – we consider this to be “poor” to date
 - b. Identification of environmental risks (and impacts) and mitigation measures – we do not consider sufficient progress has been made to date to be able to conclude decisions on the water sources schemes to be included in the NWT Solution. There is much more work required to assess the environmental impacts of the river abstraction schemes on the River Irwell and River Bollin.
 - c. Drinking water quality considerations and Drinking Water Safety Plan work – we consider this to be “poor” to date given the substantial chemical pollution risks prevalent on the River Irwell and River Bollin.
8. Section 3.4.1: **we request** that, before the Gate 3 Submission, stakeholder engagement is stepped up substantially and not limited to just producing a “stakeholder engagement

plan” as currently set out in the Draft Decision. Whilst engagement in Wales is important, there needs to be equal emphasis on engagement in England within the areas affected by the NWT Solution, including Greater Manchester and Cheshire.

9. Section 3.4.3: **we request** that the assessment of costs and benefits is developed much further than just the use of the environmental metrics. There is a need to consider a more detailed WFD assessment and associated impacts on a nascent recovering river system that are not reflected in the environmental metrics. We are very happy to work with United Utilities to better assess the impact of the River Irwell and River Bollin schemes on the river environment.
10. Section 3.4.4: **we agree** and welcome the requirement for additional work to “around the risks and issues...[relating to] the environmental sustainability of sub-options and non-compliance with the Water Framework Directive. See also our Paragraph 9 above.
11. Sections 3.4.4 and 3.4.5: **we do not consider** that United Utilities has made sufficient progress on actions to "identify the specific environmental risks of preferred supply options [and] ensure issues and mitigation measures are well understood". Many of the risks we have identified in our representation on the draft WRMP24 (attached) have either not been addressed or have not been investigated sufficiently. There is much more work required to assess the impact of the direct river abstraction schemes on the river environment.
12. Section 3.4.4: **we agree** that there are “significant concerns about the considerable programme risk that remains because of uncertainty around the environmental sustainability of the preferred sub-options with regards to complying with the Water Framework Directive” but also with wider environmental impacts beyond the WFD requirements and with the substantial chemical pollution risks associated with the River Irwell and River Bollin schemes.
13. Section 3.4.4: **we agree** that the environmental concerns and proposals for mitigation measures should be assessed by December 2023. We are happy to engage with United Utilities to support the necessary assessments.
14. Section 3.4.6: **we agree** that the Drinking Water Safety Plan and drinking water quality assessment work to date is not at the required level of detail. There are substantial chemical pollution risks associated with the River Irwell and River Bollin schemes and there is insufficient water quality monitoring data to accurately characterise the risks as neither river has been subject to regular drinking water quality monitoring by either the water company or Environment Agency (as these rivers have never been used as drinking water sources).
15. Section 3.4.6: **we agree** that there is a need for “a priority action for an extensive water quality monitoring plan, with timescales to ensure seasonal variation is captured”. However, **we request** that the work to start water quality sampling should commence during 2023 rather than merely producing a plan for monitoring at some future date beyond 2023. This will then better inform earlier whether the drinking water quality risks can actually be addressed for the costs currently assumed. We consider that the water

treatment costs and associated real-time monitoring systems of river water quality risks will be greater than currently assumed in the cost-benefit assessment.

16. Section 7.1: **we agree** that there should be a review at December 2023 against the actions and recommendations. **We consider** that given the risks identified with the NWT Solution that a Conditional Review Point should be established.

We draw your attention to the accompanying representation on the United Utilities draft WRMP24 which we would ask in read in conjunction with this representation letter.

Thank you for considering our representation.

We would be very happy to discuss our representation so that we can engage in constructive dialogue.

Yours faithfully



JOHN SANDERS
Strategic Planning Director
Mersey Rivers Trust

cc.
United Utilities Water Ltd
Water Resources West