

**DRAFT THAMES WATER RESOURCE MANAGEMENT PLAN 2024**  
**EAST HENDRED PARISH COUNCIL'S RESPONSE, MARCH 2023.**

## 1. ADVERSE VISUAL IMPACT ON THE NORTH WESSEX DOWNS AONB & ITS SETTING.

1.1 East Hendred Parish Council's north & south boundaries are between the Great Western Railway line and the Ridgeway. The area south of the A417 is in the North Wessex Downs Area of Outstanding Natural Beauty, but its setting extends northwards towards the proposed Abingdon Reservoir. The Ridgeway, a National Trail, is an 80-mile north-west facing chalk escarpment overlooking the proposed reservoir. The AONB is a nationally designated area of Outstanding Natural Beauty.

1.2 The Parish Council (EHPC) considers that the visual impact of the reservoir from numerous important public viewpoints, both within the AONB, and along c.20 miles of The Ridgeway National Trail, used by our residents, would have a significant adverse impact on a Nationally designated Landscape, within the North Wessex Downs AONB, and its setting.

1.3 The National Planning Policy Framework (NPPF 2021) paragraphs 176-7 state:

***“Great weight should be given to conserving and enhancing landscape and scenic beauty in areas of AONB, which have the highest status of protection.”***

***The scale & extent of development within these designated landscapes should be limited, whilst development within their setting should be sensitively located & designed to avoid or minimise adverse impacts on the designated areas.”***

1.4 The Parish Council (EHPC) requests answers to Rapid Gate 2 submissions on SESRO: (see Appendix 1).

QUESTION 1.

When will Thames Water publish an Environmental Impact Assessment of the reservoir, which complies with the NPPF, Infrastructure Planning (Environmental Impact Assessment) Regulations, & Ofwat's Strategic Regional Water Source Solutions Guidance for Rapid Gate 2, Feb 2022. Section 6.3 requires a (locally-based) indexed initial environmental appraisal, in addition to strategic work to-date.

QUESTION 2.

When will Thames Water comply with NPPF & Rapid Gate 1 decision on the South East strategic reservoir option (SESRO) to assess the risks from landscape impacts & engagement within the Areas of Outstanding Natural Beauty (AONB). Will it include a Risk Assessment of not complying with legal requirements to publish a comparison of the environmental impact of the alternative options prior to their inclusion in a management plan for a National Infrastructure Development Consent Order?

QUESTION 3.

When will Thames Water comply with Case Law on National Infrastructure Development Consent Orders? (The High Court Case C0/4844/2020 dated 30/07/2021 between Stonehenge World Heritage Site v. Secretary of State for Transport. The High Court found that the Sec of State had acted unlawfully in granting a Development Consent Order as an environmental assessment of alternative options against all policy & legal requirements was not carried out).

## 2. FEEDBACK ON IMPROVING THE ENVIRONMENT.

2.1 The reductions in abstractions from rivers over the last 25 years is given as 137ml/day, (Non-Technical Summary page 10). The three options propose:

### **The Three Options for Reductions on page 11 of Non-Technical Summary.**

(in million litres per day)

Areas	Low	Medium	High
Oxfordshire (6,10,11)	8	29	103
Berkshire (5,7)	11	11	57
Bucks (9,3)	9	11	11
London (1,2,4,8)	142	179	366
Total	170	230	537

2.2 Thames Water justify applying the High option to provide the highest level of environmental improvement, but this will require developing reservoirs sooner, rather than later. They propose to adapt their approach as they learn.

2.3 The Parish Council (EHPC) consider that public consultation is required on an environmental assessment of the adverse impact of whether reservoirs should be developed sooner, (for inclusion as the preferred option before 2040), or later.

2.4 The use of the High reduction option has not been robustly justified. because Thames Water have not committed themselves to it. They accept that they will adapt their approach as they learn. That is not a firm commitment. Why should the Parish Council commit to it, if Thames Water cannot do the same?

2.5 It is concluded that a more prudent option would be the Medium option, of 230 million litres per day until 2035, whilst Thames Water learn more about their approach. This would halve the demand for water for abstractions by 2050 from 321 ml/day to 160 million litres per day, which reduces the need for reservoirs sooner, (Non- Technical summary, page 13).

### 3. PLANNING FOR AN UNCERTAIN FUTURE, (Non-Technical summary p.12).

3.1 Page 12 proposes a single pathway to population projections 2025-2035.

Page 12 includes no data for population projections 2025-2035.

The Section 3 Demand Forecasts Nov 2022, provide no data for 2025-35.

#### Table 1 of the Office of National Statistics (ONS) of 2018-base projections.

##### Table 1. ONS 2018-based Population Projections (millions), March 2020.

(Thames Water's 10m population excludes Outer London, Herts, Surrey, Essex).

Area	2018	2025	2035	10-yr Increase	2043	25-yr Increase 2018-43
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London	8.9	9.25	9.56	+0.31 (+3%)	9.8	+0.9 (+10%)
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S. East	9.1	9.44	9.72	+0.28 (+3%)	9.9	+0.8 (+12%)
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##### Table 2. ONS 2012-based Population Projections (millions), May 2014.

Area	2025	2035	Increase
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London	9.67	10.5	+0.83 (+9%)
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South East	9.6	10.2	+0.6 (+6%)
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3.2 No confidence can be placed on Thames Water's pathway to population projections 2025-2035, given that the latest ONS 2018-based population projections are discussed & agreed with Local Planning Authorities before their publication.

3.3 Page 9 of the Non-Technical Summary shows a Thames Water estimated two million population growth from 10m to 12m, 2025-2050, a 22% growth over 25 years. The ONS 2018-based projection is for a 10% growth over 25 years, from 10m to 11m population, (an increase of one million).

3.4 The Parish Council has no confidence in Thames Water population estimates:

- i) They are double, (2m instead of 1m pop.), the 25-year Government ONS projections, 2025-2050, used by Local Planning Authorities to assess housing need. The demand for water from population growth by 2050 should be halved from 202 ml/d to 100 ml/day, Non-Technical Summary page 13.
- ii) The 9% ONS population growth over 10 years 2025-35, projected in May 2014, has declined to a predicted 3% population growth, by March 2020.
- iii) This is a staggering reduction that Thames Water appears unaware of. The recent projections significantly reduce the demand below that found to be insufficient to justify a new reservoir at the previous Public Inquiry.

#### **4. FEEDBACK ON DEMAND REDUCTION SOLUTIONS.**

4.1 The Draft Plan says that reducing demand makes up 50% of the shortfall.

4.2 Reducing leaks is accepted as a Priority. But reducing leaks by 16% by 2030 provides no confidence that the Government target of a 50% reduction, saving 176 ml/d, will be achieved. The target reduction is uninspiring.

4.3 Water saving actions propose a reduction of water usage from. 141 litres per person per day to around 125 litres. The Ofwat requirement for a reduction to 110 litres per day could be reduced by a faster roll out of meters.

4.4 The reduction in demand by 2050, based on the Non-Technical Summary page 13 would be:

	Source	Amount in ml/day
i)	From Abstraction	160 (para 2.5)
ii)	From lower population growth	100 (para 3.4)
iii)	From reduction in water usage	176 (para 4.2)

#### **5. FEEDBACK ON SIZE OF NEW RESERVOIR/NEW WATER SOURCES.**

5.1 Page 7 of the Non-Technical Summary does not show any “working together” with Water Companies preparing the Water Resources East & West areas, which have a higher rainfall. The lack of Inter-Regional co-operation is a significant failure of the Management Plan.

5.2 The need for a reservoir before 2050 has not been proven, given the grossly inflated demand projections and the omission of inter-regional working on accessing water from Severn Water, via the Water Resources West Management Plan.

5.3 Any reservoir, whatever its size, requires an Environment Impact Assessment comparing alternative options up to 2050, including Water Transfer from Severn Water. Expansion of existing reservoirs at Farmoor & West of London may be options for a comparison with an Abingdon reservoir.

5.4 But to scheme of national & regional significance should be included in a Management Plan prior to consultation on an Environmental Assessment, not after its inclusion, as stated on page 17 of the Non-Technical Summary.

#### **6. CONCLUSIONS.**

**THE PARISH COUNCIL (EHPC) REJECTS THE EVIDENCE BASE JUSTIFYING A NEW**

**ABINGDON RESERVOIR FOR THE REASONS IN THIS SUBMISSION.**