Wantage and Grove Campaign Group

20 March 2023

Dear Sir/Madam

Thames Water Consultation on the draft Water Resources Management Plan 2024

This is our response to the Consultation.

Introduction

This response covers the following points:

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1. The Wantage and Grove Campaign Group

1.1. **Who we are**

The Wantage and Grove Campaign Group is a non-party-political group of over 1000 individuals who live in and around Wantage and Grove in Oxfordshire. We are not against any development in Wantage and Grove but:

- Developments should be proportionate and sustainable; and
- The infrastructure should enhance and improve quality of life for its residents.

1.2. **Where we are**

Wantage and Grove and the surrounding villages jointly comprised over 15,000 households at the 2021 census. We are situated in the centre of the Vale of the White Horse.

The Vale is a predominantly rural area located in south-west Oxfordshire and is bounded to the north and the east by the river Thames and to the south by the North Wessex Downs Area of Outstanding Natural Beauty (AONB). It is located between the larger

centres of Swindon, to the south-west; Oxford, to the north-east; Newbury, to the south; and Didcot, to the south-east.

1.3. **Our interest in the Consultation**

This plan affects us as residents of the area within the Vale of the White Horse living very close to the proposed site of the South East Strategic Reservoir.

2. Our feedback to the draft Water Resources Management Plan 2024

2.1. Issues Not Covered by Your Questions

2.1.1. Drought Resilience by the 2030's

Proper Drought Resilience is delayed until after 2040 because the South East Strategic Reservoir is started first and the Severn Thames Transfer is delayed. Most of the drought resilience could be achieved by 2034-5 if the Severn Thames Transfer were chosen first. BUT true resilience must include more urgently tackling leakage and improving water efficiency. Both are essentially climate independent, and in both cases Thames Water is the worst performer and is planning to remain so.

As we stated in a response to an earlier consultation:

"The idea of improving resilience is supposed to be that you do something as quickly as possible. Your plan seems to be business as usual until 2040 and deliberately delays the introduction of schemes that could provide extra water more quickly. This is unacceptable."

2.1.2. Outdated Population Forecasts

Population forecasts are overstated and do not take account of the latest government projections which show the slower growth in UK population, so planning for a huge increase in demand doesn't make sense.

Using forecasts based on ONS 2014 when ONS 2021 is available also doesn't make sense.

If Thames Water can ignore government usage targets, then there is no reason for them to follow outdated Government population forecasts and they should take the lead in using more up-to-date (and lower) population forecasts.

2.1.3. A Plan which can be adapted

The plan is not adaptive – the Severn Thames Transfer pipeline would be much more flexible to changes in demand and changing population need and should be built first, and in stages, before the reservoir, given the very variations in population forecasts in the last few years.

The regulators asked for a plan that could be adapted over time, but this plan proposes construction of the largest infrastructure development (Abingdon Mega-Reservoir) right at the start so isn't adaptive at all.

An infrastructure project like the South East Strategic Reservoir Option is not very adaptable. Unlike flooding a valley, this huge construction would take as long to remove as to install and the cost of removal would be similar to the cost of

construction. The consequential damage to the area cannot be undone, without huge cost, once construction has started.

2.1.4. Landscape impacts

The landscape impact of the South East Strategic Reservoir Option when compared with that of the Severn Thames Transfer has not been included in the plans and as residents of the local area, we would be severely impacted.
Our estimate of the size of the reservoir is that as it would be built above ground it would be contained by bunds between 15 and 25 metres high. That's about the height of an 8-storey block of flats and higher than anything else in the Vale. The reservoir embankments would enclose about 4 square miles and be over 10 miles long and be the largest thing visible from the Ridgeway (in the North Wessex Downs Area of Outstanding Natural Beauty) or from anywhere else in the Vale of the White Horse.
The population of the Vale of the White Horse has grown by more than a third in the years since the reservoir was first proposed (particularly in OX12 and OX13 close to the reservoir – 20% in the last 10 years) and now the bunds will be within 500m of homes and it will dominate their landscape.

2.1.5. Technical Innovation

Where in the plan is technological innovation?
After the recent reporting of large numbers of incidents of raw sewage discharges, water companies are going to have to invest heavily in better water treatment. This should reduce the amount of investment required to clean up the water for reuse in the system.
Why isn't this acknowledged more in the plan?

2.1.6. When Medium is less than 4% lower than High

Given the myriad of options which appear to have been considered as part of the planning process we struggle to understand how the demand for water in the reported pathway is less than 4% lower than the highest option.
Population forecasts do not take account of the latest government projections which show that the slower growth in UK population, yet this plan seems to suggest that population migration into the South East will exceed that of the entire country.

2.1.7. When Adaptive is not Adaptive

The "adaptive plan" is not adaptive because the South East Strategic Reservoir Option (which is such a key component of this plan) will be built before the forecasts are tested. Once built the cost of dismantling the bunded mega-reservoir will be similar if not higher than the cost of construction so how is this adaptive?

2.2. Environmental Improvements

Q: We've chosen to aim for the highest level of environmental improvements. This is supported by our regulators. We'll be tracking the benefits of our work as we carry it out

and will adapt our approach as we learn more. Do you have any comments on our approach?

2.2.1. Your plan points out that “A healthy natural environment is crucial for a sustainable water supply, thriving plants and wildlife, and the health, wellbeing and enjoyment of us all. That's why protecting the environment is a priority for us.”

2.2.2. But you don’t protect the environment – you have the worst record on leakage of any company in the Country and are regularly destroying the eco-cultures of our rivers and streams by releasing raw sewage into the water network at any opportunity. We believe that there will be vast environmental benefits achieved through not discharging raw sewage into rivers. This affects us locally with your continued discharges into our local chalk stream – Letcombe Brook, and your recent decision to remove the Wantage treatment works from your sewage treatment upgrade program.

2.2.3. Your report states that environmental net gain is an approach that aims to leave the natural environment in a measurably better state than before the plan or scheme is implemented. Given the amount of raw sewage being released into our rivers at the current time that shouldn’t be difficult.

2.2.4. We understand the priority to reduce abstractions from chalk streams, but the extent of that needs to be considered in the round with other environmental issues. There should be a focus on the ecologically important chalk streams and reducing abstractions to enable those environments to be rehabilitated. We consider that this plan should push back on any narrow focus and extremist expectations from regulators and ensure a balanced approach.
Thames Water and the other water companies need to carefully calculate how much water can still be abstracted from rivers, streams and underground sources in locations which are not environmentally sensitive.

2.2.5. You admit that 24% of all of the water that you take from the environment around us is lost through leakage yet only plan to reduce the leakage outside London by 27% - how is this the highest level of environmental improvements?

2.2.6. In September 2022, Ofwat published a review of the water companies’ environmental incentives to support more water efficient new homes. The review indicates that much more can be done. Reducing the average household use of water by a substantial amount quickly can be achieved and this should be a high priority within this plan.

2.2.7. You only plan to reduce demand per household to 123 litres not to the Government target of 110 litres - how is this the highest level of environmental improvements?

2.2.8. The plan fails to adequately show how the environment local to the South East Strategic Reservoir Option would be protected or, indeed, improved as required

by law.
Given that, in 2022, the upper Thames failed to sustain even existing reservoirs without requesting excessive extraction under drought permits, it is unclear how levels in the proposed new reservoir would be maintained (especially given the evaporation rates in high temperatures over a 4 square mile area of open water).
We have also seen no evidence of how the change in the micro-climate in the Vale of the White Horse as a result of the South East Strategic Reservoir Option will affect the local environment and whether mitigation will be required.
We do not understand the reticence to prioritise the transfer of water via the Severn Thames Transfer in a pipeline which will have no long term environmental impact, to this severely stressed South East area from less stressed regions to the North and West.

2.2.9. There is a limit to the amount bill payers like us can be expected to fund and using those funds to maximum impact is vital. OFWAT has allowed Thames Water to spend £179m developing proposals over the current 5-year period. We have funded this through our bills and have seen no benefit so far. Yet your environmental projects talk about having provided £2 million for the Thames Water Trust Fund and £6.5 million to fund 60 community projects. Is this balance right?

2.2.10. In addition, it is we (through paying our water bills) who are paying your fines for releasing raw sewage and then have to pay for the environmental improvements to clean up the waterways which you ruin. This is not acceptable.

2.3. Reducing Demand to the National Target

Q: We've set out our plan for reducing demand, with government interventions, to achieve 123 litres of water per person per day on average. This is above the government's national target, but we think it's the right approach. We'll monitor and develop this by building on our learnings and evidence. Do you have any comments on our approach or suggestions for additional measures we could take?

2.3.1. How can Thames Water assume that they don’t have to meet a Government Target?
As stated above, as residents of the Thames Water area, we do not understand why our target for water usage should be higher per household than the rest of the country.
Thames Water need to invest much more (and should have done for the last 30 years) in leak reduction and demand reduction. We do not understand why they should be allowed to continue to be the worst performing water company in the country. They should be required to meet the Government target for per capita consumption by 2050 and to meet the leakage targets of at least the next worst supplier (Affinity Water)
Why should their leakage target for 2050 be allowed to be twice the leakage rate per property of SES water?

2.3.2. The 2050 target of the other five water companies in the South East ranges between 106 and 113 litres per person per day with an average of 108 litres - within the national target of 110. So why is Thames Water so far out of line?

2.3.3. If the other companies can do this, then you can't blame the government for this – although we do admit that more Government support for domestic appliance efficiency and improvements to building regulations to ensure that rain water capture in included with all new resident developments would be helpful.

2.4. Forecast Shortfall in Meeting Demand

Q: Measures to reduce demand for water make up over 50% of our forecast shortfall by 2050. Some of the activity is untested and not within our direct control. Do you think this is the right approach? Should we plan for additional new sources of water in case these measures don't deliver the water we've forecast?

2.4.1. This is NOT the right approach.

2.4.2. If you aimed for a leakage rate at a similar level to those of the other companies and the National Target for residential demand you would have sufficient water not to need the South East Strategic Reservoir Option.

2.4.3. Your approach appears to be totally focused on shareholder return to the detriment of customers and the environment. You are planning to be a water supplier to the rest of the companies in the South East but have the worst record of demand management and environmental management. This is plainly wrong.

2.4.4. Thames Water provides water and wastewater services to 15 million people, oversees a network which includes some 3,600km of trunk mains comprising around 10% of its network – some of which are up to 200 years old. But the replacement rate is reported as less than 1% with 45% of mains pre-WW2 and 15% more than 150 years old. This is not acceptable.

2.4.5. Thames Water have admitted that leakage actually increased in the Swindon and Oxfordshire zone last year. This is just incompetent. You have to find ways of reducing leakage and not just ways of providing more water to be lost through more leaks.

2.4.6. You should be focusing on sustainability of supply and bringing water from the wetter and less populated parts of the country to the Thames valley not building a huge white elephant called the South East Strategic Reservoir Option which is not strategic at all and does not meet the government requirement for adaptive solutions.

2.5. The Proposed New Reservoir

Q: A new reservoir is an integral part of our best value plan for the South East. Do you have any comments on the size of a new reservoir?

2.5.1. This reservoir is not required. It was refused in 2011 when the inspector ruled out Thames Water's proposal to build a 100 million cubic meter Abingdon Reservoir. It should be refused again now.

2.5.2. In the last consultation, Thames Water were adamant that the reservoir had to be 150 million cubic metres and went to great lengths to explain why it couldn't be smaller. Suddenly it is 100 million cubic metres, (as it was in 2011) with no sensible or transparent explanation.

2.5.3. This seems to be an excuse to store water to replace that lost by incompetence through failure to repair leaks.

2.5.4. The South East Strategic Reservoir Option would not provide a new source of water and would simply store water taken from the Thames, to be lost through evaporation from this 4 square mile "flan case" sitting in the Oxfordshire countryside. It would not be resilient against multi-year droughts because there would be virtually no water available for re-filling the reservoir during such droughts.

2.5.5. If Thames Water reduced leakage to the industry average and made sensible predictions on the effects of population growth, sustainability reductions and individual consumption, this would remove the need for the reservoir overnight.

2.5.6. If the south east is so short of water, and this is likely to be made worse with climate change as the plan suggests, then the only long-term answer is to bring in water from outside the region, including Wales and the North, not to build a reservoir which there will be limited water to fill.

2.5.7. We do not believe that plans for the reservoir are credible. Only now are our residents in the area around the proposed reservoir site being asked to give access to agents of Thames Water to allow to them to establish the characteristics of the surrounding ground, and especially the situation with watercourses, which could be affected if the reservoir is built.
Surely if these plans have been in formulation for 25 years, this work should have been done long ago?

2.5.8. We understand that much of the water from the reservoir will be piped to Southern Water and Affinity Water. We object strongly to your plan to transfer water out of the Thames Valley to Southern Water using the reservoir. You have repeatedly emphasised how water-stressed the Thames Valley is, yet you want to use the Abingdon Reservoir to supply water out of the Thames Basin. This is totally unacceptable. The whole scheme needs re-evaluation, and a transfer should only be made if the Severn Thames Transfer provides the incoming water. However, the use of desalination to provide Hampshire's water makes more environmental and financial sense.

2.6. New Water Sources

Q: Do you have any comments on the new water source options included in our draft plan?

2.6.1. We do not support the inclusion of the South East Strategic Reservoir Option in the early stages of the plan. This is not a new water source but simply an inefficient way of possibly storing surplus water, if any, from the Thames.

2.6.2. The regulators asked for a plan that could be adapted over time, but this plan proposes construction of the largest infrastructure development (the South East Strategic Reservoir Option) right at the start so isn't adaptive at all.

2.6.3. You should put transfer of new water via the Severn Thames Transfer scheme into your early plan and deliver it by the mid-2030s. It will bring new water into the area, and is adaptable and easy to upgrade. You should also increase your focus on Recycling schemes in the London area, as these too can be delivered ahead of a reservoir.

2.7. Best Value for Our Customers

Q: Do you think our draft plan represents the best value plan for you, your community and the environment?

2.7.1. No. We believe that your plan represents very bad value for customers of Thames Water and our environment.

2.7.2. Your intention to avoid implementing sufficient leakage reduction and water efficiency measures means a huge, unnecessary infrastructure building program with all the accompanying environmental damage and carbon footprint.

2.7.3. The South East Strategic Reservoir in particular has very high environmental impact and carbon footprint in construction, and, if you just met the Government's efficiency target and reduced your leakage to be in line with the average of other water companies, there would be no need for the reservoir.

2.7.4. Of course, your program is better value for your shareholders, who will see a healthy cash flow coming in from the water bill increases to pay the capital cost repayments to your parent company for the cost of the Reservoir that we don't need. These hidden costs amount to billions over the next 50 years and you should be telling customers what this will mean for their bills.