



## Water Resources Forum, March 2019 – Briefing paper

### Overview of feedback to the further consultation on our revised draft Water Resources Management Plan 2019 (rdWRMP19)

#### 1. Background

We are developing our Water Resources Management Plan (WRMP) 2019 which sets out how we intend to provide a secure and sustainable supply of water for our customers over the next 80 years, from 2020 to 2100.

Over the past 4 years we have engaged with stakeholders and customers and used their feedback to shape the development of our draft plan. We ran a public consultation on the draft plan between 9<sup>th</sup> February and 29<sup>th</sup> April 2018. Stakeholders and customers were encouraged to give their views through a variety of channels, including public meetings, an online survey and written submissions. In response to the feedback, and new information, we made a number of changes to our draft plan. We held a Water Resources Forum in August 2018 to update interested stakeholders and in October 2018 we published our formal response to the public consultation, called the Statement of Response, and our revised draft plan. We held a further consultation on the revised draft plan, between 3<sup>rd</sup> October and 28<sup>th</sup> November 2018, to provide an opportunity for comment on the changes we had made. This note provides a summary of the key issues raised in the further consultation.

#### 2. Feedback to the further consultation

We publicised the further consultation through a number of channels and sought feedback in writing (email, letter or feedback form) or via an online survey. Overall we received 751 responses, around half of the responses were written responses and half were via the online survey. In addition we undertook research with our customers to seek the views of our representative customer base.

**Representations from regulators and appointed bodies** - These representations did not fundamentally challenge our proposed plan but raised specific comments such as the need to improve the transparency of the decision making process, the need for on-going studies on resource options, challenge to the ambition and delivery of the leakage reduction programme, and the adequacy of assessment and mitigation for designated sites and heritage assets. There was also wide support for greater collaboration between water companies.

**Representations from stakeholder organisations and individuals** – There were wide ranging comments raised by stakeholders. GARD submitted a lengthy representation, in excess of 200 pages, reinforcing a number of points raised in the preceding consultation including inflated population forecasts, over-stated climate change impact on available water resources, opportunities for further leakage and reduction in consumption and re-introduction of Teddington Direct River Abstraction scheme. Cotswold Canals Trust also submitted a substantial representation which set out its

challenge to the preference for a pipeline for conveyance over the restored Cotswold Canals as part of the Severn-Thames Transfer (STT) scheme.

**Representations via the online survey** - The majority of the responses received via the online survey were from individuals who either supported the restoration and use of the Cotswold Canals to support the STT or who opposed the reservoir.

### **3. Summary of the main issues raised**

**Leakage:** Overall the higher leakage reduction targets were welcomed, particularly the new target for 2050. Opponents to the reservoir suggested that doing more to reduce leakage, along with other changes to the plan, could negate the need for a reservoir. A number of stakeholders expressed concern about the deliverability of the leakage targets and asked for reassurance, including a more detailed description of how we plan to achieve these targets.

**Managing demand for water:** Overall measures to manage demand were supported by customers and the majority supported an increase to the programme of activity. Some stakeholders recognised the risk from over reliance on these measures and stated that these measures will not provide the level of resilience that consumers expect from their water companies.

**Reservoir:** There was strong local opposition to the reservoir and calls for a public inquiry from some local residents, parish councils in the vicinity of the reservoir and campaigning organisations. The main concerns raised are the visual impact of the scheme, potential exacerbation of local flooding, environmental impact, close proximity to local villages and safety aspects. Affinity Water's involvement added to concerns, with respondents citing that Affinity Water's requirements are not confirmed and that TW would profit from selling water. A number of organisations and individuals expressed support for the reservoir and argued that it should be brought forward even earlier, in order to protect chalk streams sooner and increase resilience. Feedback from our wider customer base indicated that the majority were in favour of the reservoir, with it being the preferred strategic option, and one in ten respondents asking why the reservoir isn't in the plan until the 2030s.

**Teddington Direct River Abstraction:** Some stakeholders were encouraged that TW had taken on board comments about the potential negative environmental impacts and had removed the scheme from the draft plan. On the other hand, there was concern raised that a central plank of the plan had been removed at a late stage in planning, and replaced with options on which there was less information and why we had not done more to look into mitigation measures instead of removing the scheme from the plan.

**Deephams Reuse:** Respondents opposed to the reservoir called for consideration of more reuse plants. Other stakeholders mentioned possible negative impacts on navigation and river ecology that need to be investigated. The EA raised concerns about the reduction in river flow and the environmental impacts on downstream habitats, and the need to consider alternative options if Deephams Reuse is not taken forward.

**Oxford Canal Transfer:** The EA also raised significant concerns about the Oxford Canal-Cropredy transfer in terms of the reliability and environmental impact that need to be addressed.

**Severn-Thames Transfer (STT):** Respondents opposed to the reservoir called for consideration of more transfers and argued that the STT should not have been deferred. Supporters of the Cotswold Canals (local residents and canal users, and bodies with an interest in canals) showed strong support for a transfer via Cotswold Canals, rather than a pipeline. Other stakeholders recognised the need for further investigations and partnership working before the scheme could be implemented. Water transfer schemes had a mixed response from customers with common concerns being the security of water supply, potential environmental impacts and lack of control.

**Justification of the preferred programme:** The EA raised a number of points in relation to the programme appraisal process, and the transparency of the narrative to explain the choice of the preferred programme. Several stakeholders highlighted uncertainties in the plan, mainly around (i) Affinity Water's requirements for the reservoir and (ii) options introduced or brought forward to replace Teddington DRA. Ofwat flagged the need to consider the sensitivities to different planning scenarios and the EA suggested the need for more adaptive planning to provide greater confidence.

**Regional planning:** Stakeholders were positive about TW's active involvement in regional planning through the Water Resources in the South East group (WRSE) and other mechanisms. They recognised the difficulty of regional planning because of, for instance, different timetables for the different water company plans, interdependencies between plans and the absence of a regional WRMP. They emphasised the need for TW to continue to engage in regional planning, particularly over the reservoir and water transfers to achieve the least regret and optimum solution for the South East.

#### **4. On-going engagement and next steps**

Over the past 3 months we have engaged with the EA to review all the issues raised in their representation. We have continued to work closely with Affinity Water, the WRSE Group and other water companies in regional planning groups, to ensure effective collaboration and alignment between company's plans. We have also met a number of other organisations to discuss issues of concern. We have continued to engage with our Customer Challenge Group and have completed further research with customers to explore planning for enhanced resilience to drought and protection of vulnerable chalk streams.

We will publish our formal response and updates to the revised draft plan at the beginning of April 2019 on our website [www.thameswater.co.uk/wrmp](http://www.thameswater.co.uk/wrmp). We will also email all respondents to the further consultation setting out our consideration of the points raised.

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