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Dear Simon Adams,

Public Consultation on the South East Strategic Reservoir Option (SESRO)

Consultation End date 28 August 2024

Thank you for your correspondence dated 5 June 2024.

This is the response of the Vale of White Horse District Council (VWHDC) to your non-statutory consultation on emerging design options and interim masterplan for the South East Strategic Reservoir Option.

In compiling this response, VWHDC has had regard to your

- Summary brochure
- Technical brochure
- Interim Master Plan
- Options appraisal reports
- Draft design principles
- Map book
- Questionnaire
- Factsheets

The following comments are in direct response to these documents and do not override or change the council's stated opposition to this project.

VWHDC maintains an objection given ambiguity on costs, environmental and human impacts and the need for the reservoir not proven through an adopted Water Resources Management Plan (WRMP).

Overall, VWHDC consider that this non statutory consultation on preferred options is premature because options are not based on sufficient background information and

data. Options are not evidence led and it is not known if options are viable and practical.

Emerging Design Options

Key constraints – no comment.

Process

Q11. Do you have any comments on the process we undertook to develop our preferred options for the infrastructure associated with the reservoir?

VWHDC considers that until the WRMP process is concluded, the preferred option process is premature, as size and need can only be demonstrated from an adopted management plan.

Furthermore, to appraise the impacts and benefits of any scheme, detailed environmental surveys are required to first identify the sites constraints and opportunities before entering the design stages of a project. With a scheme of this scale the need for accurate and detailed surveys are critical. As Thames Water have not been able to gain access to a large proportion of the site, these essential surveys have not been completed. Therefore, VWHDC is being asked to comment on a wide range of options relating to specific elements of the project with very little technical information to make an informed view.

The future management of the proposed environmental enhancements is also unclear. The long-term management of habitats such as wetlands, grasslands, aquatic features, woodlands etc need to be factored in at this stage, alongside the other proposed recreational features such as paths, cycle routes, visitor centres and water sports facilities.

The proposal indicates the creation of some environmental enhancements to mitigate the losses (which are unknown due to lack of surveying), however it is not clear what fiscally sustainable management strategies will be used to secure their long-term retention / enhancement, or if they are even sufficient to mitigate for the harm.

Additional comments on the process from our specialist technical officers are set out towards the end of this letter.

Rail siding

Q5. We are considering options for the rail links to the site. Our preferred option is Option 5. Do you have any comments on these plans?

VWHDC support the preferred option in the event that the rail sidings allow for the future provision of a railway station for Wantage and Grove after the decommission of the materials handling works.

The area to the south-west of the site should be safeguarded for Wantage and Grove railway station.

Rail siding provision to allow for material transport to the site is, as identified in the Rail siding and Materials Handling Area Options Appraisal Report, essential infrastructure to support the construction of the reservoir.

The supporting documentation currently state that "*At this stage it is expected that the rail siding would be used for construction and then demolished and landscaped or returned to agriculture when construction of the reservoir is complete.*" However, if the rail sidings are constructed in such a way (far enough away from the mainline) to allow for a railway station to be constructed after the materials handling works are complete, this would allow for the provision of a new Wantage and Grove railway station in this location. This not only supports the delivery of a long-standing safeguarded transport scheme in the district, but it also provides a valuable opportunity for visitors to travel sustainably to access future leisure activities at the reservoir, thereby reducing demand for car travel to the location. This would prevent the railway tracks from having a life cycle of only 4 years, where tracks could be repurposed for passenger railway services and provide a significant benefit from the scheme. Any further support for the delivery of the railway station would be of further benefit to the scheme and local community.

The details of rail and road access to the reservoir site lack any information on the amount of freight to be imported and quantity of construction related traffic.

It is unclear why the haul road is annotated in some plans (Figure 0.2 and 6.1 of the Rail Siding report) to extend north-east to the canal restoration route, as opposed to the diverted East Hanney to Steventon Road. The bridge for haulage vehicles described as having potential to deliver the Steventon to East Hanney bridge for the future canal should be designed in such a way to ensure that towpath and canal requirements are catered (both width and height perspectives), as opposed to just catering for haulage vehicles from the rail sidings.

It is unclear what the 'Indicative RFS' label on Figures 0.2, 6.1, and 7.1 of the Rail Siding report relates to or what it indicates.

The consultation documents identify that the road traffic would generate less than 20 HGVs per day, with the rail siding, however it would be helpful to understand the schedule for use of the railway sidings vs road-based deliveries for the site, i.e., number of vehicles per day for both modes, as well as associated road routeing. CLOCKS and CCS accredited contractors should be used for contractors travelling to the site by road.

It is described that there will be a period when deliveries will be by road to prepare the site, construct a site compound, construct the railway sidings, and access roads, as well as provide floodplain and waterway diversion works. It would be helpful to know the scale of road deliveries through the full programme of works for the reservoir (as well as any changes in routeing managements). Further information is needed to understand the scale and nature of the deliveries that are not associated with aggregate transport by rail. Additionally, capacity / capability for non-aggregate materials to also be transported to and from the site by rail should be explored.

Ecological survey is needed to inform assessment. Further investigation is also required of the quality of Hutchins Copse to fully demonstrate the benefit of its retention.

Road appraisal

Q6. We are proposing to build a new access road to the site for construction vehicles. Once the reservoir is built the road could be used as the access for visitors for recreational use. Our preferred option is Option B. Do you have any comments on these plans?

No transport modelling information has been provided within the methodology or options assessments to indicate which options are viable, practical, and evidence led. In the absence of evidence, VWHDC is therefore not able to confirm which option or alternative option would be acceptable.

Notwithstanding, based on the information available option B appears to be preferable, as it could deliver access along part of the South of Abingdon Movement Corridor safeguarding scheme, which is a revised safeguarding scheme published in the Regulation 18.2 South and Vale Joint Local Plan consultation.

The point raised regarding better access for non-motorised users for Option C & D are not considered strong arguments as the shared footway, although a longer distance from Marcham, is still available for the entire distance along the southern side of the A415 to Marcham Interchange, while Abingdon is likely to generate more visitors due to the scale of the settlement.

Furthermore, the Abingdon Local Cycling and Walking Infrastructure Plan considers the A415 to be a primary route (ABP05), while Barrow Road and the unnamed road to the north of Option B is considered to be a secondary LCWIP cycle route, which in turn is accessible from Faringdon Road (LCWIP primary route ABP07).

VWHDC entirely agrees with the sentiment that Marcham has considerable constraints, as highlighted in paragraph 3.2.5 of the Access and Diversion Roads Options Appraisal Report, with an Air Quality Management Plan Area for the road passing through the village and road width constraints for larger vehicles.

As such the part of the A415 which passes through Marcham should be avoided for all traffic associated with the reservoir, including private vehicles for construction workers, vehicles transporting construction materials and equipment, and private vehicles for employees and visitors once the site is complete. Paragraph 3.2.6 should refer to the local road network managed by Oxfordshire County Council, as opposed to the 'strategic road network' managed by Highways England.

Due to the lack of modelling presented it is unclear what impact there will be from the proposed access near Marcham Interchange, which is already congested at peak times. VWHDC remain concerned that traffic may route through Frilford and Marcham which experience peak period congestion issues. The proximity of the proposed junction to Marcham Interchange will therefore need to be carefully modelled to fully understand its impacts.

Modelling should be undertaken for both construction and future visitor trips with the Dalton Barracks site fully occupied and all other local plan growth for the Marcham Interchange, Marcham village and the Frilford junction. This information will enable us to understand if the proposal is acceptable and what measures may be needed to ensure the safe and effective operation of the highway network. Modelling also needs to account for Dalton Barracks construction traffic which is likely to take place at the same time as SESRO construction.

The PROW route between north Drayton and the site appears to be illustrated with a significant diversion as per Figure 4.1, and others, in the Access and Diversion Roads Options Appraisal Report. The diversion appears to cross the Wilts and Berks Canal restoration route, but it is not clear as to why walking, cycling and horse-riding route is required to divert from the desire line so much.

It would be helpful to provide further detail as to when the capacity of the proposed roundabout for Option B would be reduced as identified in paragraph 5.3.8 of the Access and Diversion Roads Options Appraisal Report.

It is expected that Local Transport Note 1/20 compliant pedestrian and cycle infrastructure be provided for the main access route for the site, as well as all other access points for the reservoir.

For staff travel, VWHDC expect there to be a staff park and ride arrangement to minimise the impact of employee journeys on the road network, both during construction and ongoing operation. Dedicated bus provision should also support employing people locally. Restrictions to on-site staff parking should be employed.

The proposed new East Hanney to Steventon Road could also be a cycle and walking friendly route to the future Wantage & Grove railway station for staff and visitors alike.

The report says that Option B is largely the same as Option A and VWHDC would appreciate confirmation that the flood modelling to investigate the opportunity for a dual-purpose function to construct one embankment to provide both access the SESRO site as well as flood storage is still included in the preferred Option B as the report is unclear on this. From previous flood modelling work undertaken by the Environment Agency, it is noted that a scheme in this location is technically feasible.

Q7. Several routes have been considered to replace the existing road between East Hanney and Steventon. Our preferred option is Option A. Do you have any comments on these plans?

Again, without suitable modelling outputs the VWHDC is unable to provide a response to optioneering, however Option A appears to be preferable based on the information available.

It is expected that 3m wide shared cycle / footway provision would be provided on both sides of the road, as well as all roads associated with the development.

In addition, suitable space should be made available for sustainable drainage for the new road with appropriate water quality management incorporated.

The connection of the proposed diverted road with the A338 to the west in all options appears to effectively lead people who are walking and cycling on the proposed new road to a 50 MPH road where there are no pavements i.e., a dead end for walking and, perhaps, cycling. If the access was routed further south this would be prevented. There is a pavement which terminates approximately 130 metres north of the railway line, on the western side of the A338, that could be linked up with to provide ongoing active travel journeys towards Grove and Wantage. Furthermore, Wantage and Grove are at the start of developing a Local Cycling and Walking Infrastructure Plan which will, no doubt, seek to connect with the possible railway station, as well as possible range of community amenities sought to be provided within the reservoir site.

Suitable crossing facilities would need to be provided to allow people to safely cross the A338. This also improves access to the site from bus stops for the S9, X36, and X1 bus services. Active travel journeys may then also be undertaken between Steventon and East Hanney along the proposed diverted road and non-motorised vehicle route located to the west of the reservoir.

VWHDC acknowledge that the road alignment to the west is likely to be designed in such a way to avoid flood zones 2 and 3, however the road could be brought parallel to the A338 to allow the aforementioned configuration for active travel. Alternatively, a solely active travel route could be provided along the side of the A338 to link with existing pavements. A suitable crossing point should also be provided for this arrangement.

The retained part of the Steventon Road for East Hanney should be provided with a pavement to allow segregated walking and cycling to the reservoir, passing spaces should be implemented to retain two-flow movement of vehicles with expected low numbers of visitors by car. Car parking for this minor car park should be in accordance with OCC's parking standards, while encouraging travel by other modes. Similarly, the retained part of East Hanney Road by Steventon should be amended in a similar fashion.

Although the Access and Diversion Roads Options Appraisal Report indicates criteria which promotes connections between the reservoir and nearby settlements (as well as those settlements to each other) for non-motorised users, there doesn't seem to have been much work undertaken to improve connection to and from Marcham and Garford, with PROW routes to the edge of the SESRO site labelled but entire corridors to these settlements not explored.

Should larger events be accommodated at the reservoir site, Controlled Parking Zones for surrounding residential areas may need to be considered.

The gradient changes described for culverts and other water body requirements for the diverted road as set out under paragraph 8.2.2 in the Access and Diversion Roads Options Appraisal Report does not highlight the need to accommodate canal boat elevation and width requirements for the canal which, once restored, would pass

under the new road to the south-west of the site. It seems remiss for the project to safeguard land for the canal, but not provide crossings of it that are of a suitable height to allow its future use. Further comment on canal restoration is provided under heading Q10 in this response. Although this need is identified under 9.1.2, it would be helpful to re-iterate this need in each instance where it is relevant.

Measures should be implemented to prevent any parking on the proposed new road, as well as to prevent excessive driving speeds while maintaining suitability for bus services (X36).

There should not be any severance of PROWs from the new road diversion (or any highway for the scheme), crossing facilities should be provided at each location that the new road crosses. Additionally, restoration of the canal should not be hindered by the new road, with a suitable bridge, allowing both canal and towpath to be accommodated beneath the road (ref 9.2.23). Any further support in the delivery of the canal, while suitable machinery is already on site to construct it, would be of further benefit to the community.

The report acknowledges that flood compensation will be required for the access road. This will need to be detailed with consideration also provided for groundwater and the embankments proposed to drain.

Water treatment works

Q8. We need to identify a location for a proposed Water Treatment Works, which is currently proposed to be designed, consented, built and operated by Southern Water. Our preferred options for the location of the Water Treatment Works are Option 2 and Option 4. Do you have any comments on these plans?

VWHDC considers that until the WRMP process is concluded, facilities to serve Southern Water are not yet proven to be needed.

Further comments from our specialist technical officers on water treatment work options are set out towards the end of this letter.

Connectivity to the river Thames

Q9. We are proposing Option B as our preferred option for our intake/outfall structure. Do you have any comments on these plans?

The scale of the intake / outfall structure will have a negative impact on the visual amenity of the locality.

VWHDC also has concerns about the impact on cycle route NCN 5, on Peep-O-Day Lane, south of Abingdon. The construction of the preferred intake / outtake option, and indeed any option on the west bank of the Thames, is likely to affect access along NCN 5. This is an important and well used active travel link connecting the villages south of Abingdon, Harwell Campus and Milton Park through to Abingdon and Oxford by bike, on a route that is direct, safe and also positively attractive and pleasant to use. It will be particularly important to minimise any disruption to this route to ensure active travel usage on this network is maintained.

Further comments from our specialist technical officers on river Thames connectivity options are set out towards the end of this letter.

Q10. We have considered several options for the Emergency Discharge and Option C is our preferred option. Do you have any comments on these plans?

VWHDC considers emergency discharge is not fully developed. There is no consideration about the impact of an emergency discharge into the river Thames and there is an unjustified assumption that because it is the only possible destination for the discharge, that the river can take the discharge. There is also lack of information on what happens in times of flood on the river Thames.

The discharge flow rate compared to that of the Thames is considered significant. Nearest flow measurements https://nrfa.ceh.ac.uk/data/station/meanflow/39046 at Sutton Courtenay show a mean flow in the river of about 1/3 of the emergency discharge flow and this flow is only as high as the emergency discharge flow less than 10% of the time. If the river is in high flow, emergency discharge will cause flooding and if it at an average or low flow, the discharge will rapidly and massively change the flow rate of the Thames with serious impacts for safety and river wildlife for many miles downstream.

Whilst a piped solution is acceptable, all options need further consideration. VWHDC is, in principle, supportive of the open channel variant of the emergency draw down for the reservoir where it could enable reinstatement of the canal, provide for habitat creation and species movement. The SESRO team are encouraged to investigate the opportunities of an open canal in more detail. It is however acknowledged there are associated ecology and heritage concerns with an open channel. Detailed comments from our specialist technical officers on this matter are set out towards the end of this letter.

Watercourse diversions and flood replacement storage

Please see comments from our specialist technical officers set out towards the end of this letter.

Master Plan Design Principles

Q12. We have presented our draft design principles for the SESRO Master Plan. Do you have any comments on our draft design principles?

Design vision

VWHDC considers the vision is unclear on how a reservoir will help protect the environment from drought and what is meant by *high quality spaces for nature and recreation*. There is nothing in this proposal that would create a legacy for communities and the environment local to the site, other than harm.

All Company Wide Design (ACWD) Principles

VWHDC has no comment to make on your ACWD principles.

SESRO Overarching Design Principles

Overall, principles require working up into further detail, informed by survey and assessment work (such as ecological surveys and Landscape Visual Impact assessment). Principles should be improved so that they do not indicate weak commitments such as 'to consider' and to do something 'where reasonably practicable'. Design should seek to avoid impacts in the first instance.

Safe and well
VWHDC supports the stated principles but consider the design principle of ensuring no increased risk of flooding for local people from rivers, surface and ground water during construction and operation should go wider to manage and reduce existing flood risk.

Climate
VWHDC supports the stated principles but consider all excavated material should be used on site, and the drive for net zero emissions throughout the project should be prioritised.

People
VWHDC supports the stated principles but consider active travel and use of public transport should be the primary option for access.

Place
VWHDC supports the stated principles but consider the Wilts and Berks Canal Trust's aspiration for reinstating the canal should form part of the design to enable full recreational benefits to be realised.

Value
VWHDC supports the stated principles.

Interim master plan
Q13. Our Interim Master Plan is an overall spatial layout of the proposed reservoir site, including wetlands for capturing flood water and introducing diverse ecology, operational areas, such as for treating water or transferring it to and from the reservoir, amenity areas, public access, woodlands, footpaths and others. Do you have any comments on our Interim Master Plan?

VWHDC welcome the proposed landscape-led approach to the scheme but consider to minimise effects on the environment and deliver benefits for nature and people, that the masterplan is led by the relevant technical studies and assessments yet to be undertaken and that the design process remains iterative and flexible to respond to those assessment findings.

VWHDC consider the interim masterplan has missed opportunities for:

- Visitor / recreation access direct from Steventon village
- Wilts and Berks Canal restoration
- Provision of new Railway Station at Grove
- Delivery of Abingdon Flood Alleviation Scheme as a by-product of SESRO via a bunded northern access road.

- Renewable energy commitments.

Furthermore, no consideration has been given for replacing the existing solar farm within the site.

Additional comments from our specialist technical officers on the interim masterplan are set out below.

Other comments

14. Do you have any other comments relating to the proposals for SESRO at this stage in the process?

Need

VWHDC considers the need for the reservoir should be reassessed with a pause in the RAPID process to examine alternatives such as a water transfer network to create a national water grid and the council will be making separate representation to Government to ask for this.

The Revised Draft Water Resources Management Plan 2024 identified that planning for a 100 Mm3 reservoir would perform better from an environmental standpoint, while the 150 Mm3 reservoir resulted in a plan which was more resilient to risks. Thus, if the reservoir is considered to be necessary through the Development Consent Order process, the smaller variant should be considered in more detail.

The 150Mm3 reservoir option is considered to prevent the need for 'emergency restrictions' events to occur more than once per 500 years, but it is unclear what an 'emergency restriction' entails. It is not clear if this would be limited to summertime hosepipe bans (with limited impact to residents and business) or go further than this to standpipes, rota cuts or water tank provisions.

Reservoir design and safety

There is a concerning lack of information on the engineering design of the reservoir itself and the proposed safety design of embankments. Currently the scheme envisages to undertake 8 years of construction works on the reservoir before undertaking a dam break analysis and emergency response plan for the reservoir. VWHDC requests dam break analysis work to be undertaken ahead of finalising embankment design and for that analysis to be included in the formal DCO consultation.

The safety of the reservoir and its water quality, together with local impacts of its construction are not adequately addressed in the current documentation and this needs to be fully detailed ahead of formal DCO consultation taking place.

Further assessment is also required on emergency discharge as current proposals to discharge into the river Thames will have an impact on residents and the river.

Raw Water Treatment

If the reservoir is built, a key element of its value from a water resources perspective is then to provide a Water Treatment Works to distribute water around the region. However, the extent and impact of these further works are not considered in the

review / RAG testing of the reservoir, thus a full understanding of the impact of what is being consulted on is not possible.

It is unclear to what extent works are needed to deliver the relevant water pipes to Swindon, 'Oxfordshire', Slough, Wycombe, Aylesbury, and Hampshire. Furthermore, it is unclear how the capacity of the water treatment works compares with other similar sites.

Noise
Our Senior Environmental Protection Officer comments:

The proposed development, should it go ahead as proposed will need comprehensive Noise and Environmental Management Plans. Such plans shall identify noise and dust impacts on local residents in locations including (but not necessarily limited to) East Hanney, Garford, Marcham, Abingdon, Drayton and Steventon.

All phases of work must be considered, including enabling works, construction works and ongoing operations of the reservoir and all associated structures (such as generators, turbines, and pumps).

In addition to identifying any impacts, such management plans shall also identify mitigation measures for any impacts and procedures to ensure that any required mitigation is in fact carried out.

While these matters represent a level of detail that is not covered by the current consultation, the principle of such management plans should be established at an early date in the process to ensure that they are incorporated into design decisions rather than as a "bolt-on" after such decisions have been made.

Ecology
Our Senior Ecology Officer comments:

As a consultee, it is difficult to provide meaningful feedback on the proposals (or the matters within scope of discussion – specifically excluding need, location and scale) in the absence of technical information to review.

It was determined at the stakeholder consultation event that only c.20% of the site has been subject to technical surveys, including ecological surveys, due to access constraints. In my opinion this is a significant evidence issue. It raises material questions over the quality and reliability of the information that will be included and assessed within the forthcoming Preliminary Environmental Information Report, and submissions to PINS thereafter. I am unsure how a robust and informed planning process can be achieved under these circumstances.

The use of aerial photography to inform habitat assessments may have some merit for the parcels of land subject to arable cultivation, but other habitats should be subject to detailed assessment.

The nature and magnitude of impacts on species groups remain mostly unknown without survey information. Notable concerns are expressed with regards to impacts

on otters and water voles through watercourse realignment, and the impact of habitat loss on populations of farmland birds such as skylarks.

Much of the optioneering work to date has been completed and preferred options presented, with alternatives being excluded. This is concerning as, in the absence of technical surveys and information gathering, the adoption of a preferred option has likely been made with incomplete information. Had all relevant information been available to consider, different preferred options may have been chosen.

The following general comments are offered on matters, notwithstanding that I have little technical information available to review to inform these views:

- **Railway sidings:** It is supportable that option 5 retained Hutchings Copse Local Wildlife Site. It is not known whether this option would impact on other ecological receptors, including protected species, priority habitats, watercourses or other valuable habitats.
- **Main access road:** Generally speaking, the option with the shortest route would likely be preferable as this would result in the smallest land take. All options appear to cross watercourses and could sever potential linear habitats for commuting and foraging bats. I do not have sufficient evidence before me to expand on this.
- **Road diversion:** The shortest route is likely preferable from an ecological perspective. See comments above on main access road.
- **Water treatment works:** It is recommended that the WTW are located in areas closest to the reservoir in areas already likely to be lost to development works. This minimises habitat loss and creep of built development in the wider landscape.
- **Conveyance tunnel:** It is difficult to express a view on these matters in the absence of supporting information. Options H and G appear to be less suitable as they would involve tunnelling underneath the river Thames and establishing infrastructure on the eastern banks. Other options avoid this by establishing infrastructure on the western (closer) bank. All options are likely to have notable ecological impacts and require sensitive design and placement.
- **Auxiliary drawdown channel:** An open cut channel through the landscape is likely to have greater ecological impacts on existing habitats than tunnelling alone. However, an open channel creates opportunities for habitat creation with areas of permanent water and marginal planting, at the expense of other habitats.

It is not known whether Thames Water are intending to retain landscaped areas around the reservoir when complete, for the purposes of ongoing management. These could be transferred, with funding, to suitable nature conservation or recreational organisations. The long-term stewardship of created places and facilities should be explained.

Habitat and landscape creation proposals appear to be generally supportable, though it appears that habitat creation on top of the landscape fill on the outward side of the bund embankment lacks structure. Designers are encouraged to increase tree and scrub cover.

At the interface between water and land within the reservoir (rip rap), the designers are encouraged to explore ways to enhance biodiversity in this area. A varied size of rip rap could potentially accumulate organic matter or sediment and provide a growing substrate for vegetation over time. In suitable locations, for example the sheltered eastern corner where wave energy is lowest, a green engineered solution could be explored to maximise environmental benefits.

It is encouraging to note that the RSPB and other suitable organisations have been involved in the development and design of the proposed wetland/floodplain storage areas. The scale and nature of input into the designs should be recorded and clearly communicated.

Public access should be wholly restricted in the areas of the site of greatest ecological value or designed to provide habitats for the most sensitive species (e.g., nesting curlew). Maintenance access should be provided to all areas.

Habitat creation to expand and complement existing designated sites, such as the Hutchins Copse LWS, is supportable.

It is not known whether any specific types of habitats need to be created to satisfy BNG trading rules or whether specific provision made for an impacted species group.

Landscape

Our Senior Landscape Officer comments:

As a consultee, it is difficult to comment on the proposals in landscape and visual terms as there is limited supporting information to be able to base an assessment off, especially in terms of the appearance of the proposals.

Q5. Railway Sidings – TW preferred Option 5
The landscape to the east of the A338 is quite open, with views from the A338 and over the railway from the south. Care will be needed with the design of the Options.

Q6. Road appraisal – TW preferred Option B
This would seem that the preferred Option B would be least impactful in terms of potential landscape and visual impact. It may also be able to be linked into potential access requirements for Dalton Barracks.

Q7. Steventon to East Hanney Road Options – TW preferred Option A
Option C is not acceptable in landscape and visual terms.

Option A would have the least landscape impacts although Option B2 may be preferable for other reasons including reducing the pressure of traffic within the centre of Steventon which would have an impact on improving its character.

Q8. Water Treatment Works – TW preferred Option 2 and 4
No visual indication of the appearance of the options and limited landscape and visual information has been provided; therefore, we cannot give an informed opinion on the different options. My preference would usually be to cluster development together rather than to locate it in different locations, so Option 2 is likely to be preferable, and Option 1 and 3 are unlikely to be the preferred option. Interestingly

the constraint area for the WTW around the railway is different to that indicated on the rail sidings plan.

Q9. Connectivity to the river Thames – TW preferred Option B
With limited landscape and visual information, it is difficult to express a preferred Option. It is not preferable to locate the structures on the eastern side of the river, where the Thames path is located, Option G and H. Impacts on views from the Thames path across the river should also be considered for the other options. There is a well walked local route along the Thames which connects the Wilts and Berks Canal Trust Inlet northwards to the Marina Park. This area of south Abingdon is impacted by the Sewage works, gravel extraction etc, and this circular walk is located away from these detractors. Option A, B and C would all have an impact on this route, and this should be taken into account when looking at site options.

Q10. Emergency Discharge Infrastructure – TW preferred Option C, the tunnel
It is difficult to comment on the proposals regarding the landscape and visual impact due to the limited amount of information provided on the visual appearance of the proposals, the scale of embankments, cuts required along with the replacement flood storage and where and how this is to be accommodated. The depth and cross sections of the structures, the required scale of the proposed bridges, locks etc will all need to be looked at with regards to landscape character and visual impact. There is no indication of whether the Auxiliary Drawdown Channel would contain permanent water, and how much the design would need to differ if it was also to accommodate the canal. I note that all options still require a conveyance tunnel even if an Auxiliary Drawdown Channel is proposed.

Q12 Interim Master Plan
The success of the proposed Master Plan for the site, will be designing in how the site is to be managed at the onset, and how access for management to protect biodiversity can be carefully coordinated with public access.

If livestock are going to be used to maintain the landscape this needs to be implemented and designed into the site at an early stage including any associated farming infrastructure required. To allow movement of livestock between areas of the site and avoid the mixing of public access areas and livestock areas.

The creation of different woodlands which may have different functions should be included into the masterplan, currently some woodlands are very thin. Woodlands could have limited public access with active management for produce such as coppice with standards, and others with greater public access.

There is likely to be an increased movement towards the reservoir from users of the PROW network. There are a number of points where PROW cross the railway at grade, and it should be looked at whether there will need to be bridges or other more formal crossings to accommodate potential increase movement over the railway and also crossings over the new road. There may also be a change of users of the PROW network such as increase horse and cycle movement, and this should be designed into connection to the site.

There is a need for some segregation of users, especially closer to the car parks. Often younger/older and less mobile users find the use of shared cycleways/ footpaths difficult and there is a need for shorter circular footpath routes which are bike free to accommodate these users.

Careful design will also be needed with regards to bikes and slopes. There are limited opportunities for mountain biking in the local area and the slopes created by the reservoir will be an obvious draw to bike users. This should be designed into the cycle network, to accommodate and manage this type of use at the onset rather than trying to address problems arising at a later date due to lack of provision.

The visibility of the water sports will also be a key safety issue with regards to monitoring the water users, and it is likely that built forms will be needed at the top of the reservoir to accommodate this.

The level change will need to be designed into the accessibility of the water sport use of the reservoir. It is a considerable distance and level change between the proposed visitor facilities and any access point onto the reservoir.

I note the recreational ponds are first proposed to be used as settlement ponds, is there a potential conflict with the amount of sediment and future recreational use? Are there additional opportunities to soften the appearance of the stone interface of the reservoir, can treatments such as coil and gabion mattresses be used to create planting interfaces as well as the proposed floating islands.

Lighting will need to be carefully designed into the proposals. This is both with regards to the proposed buildings and also the surrounding access and recreational routes. East and West Hanney are street light free villages, this principle of limited lighting should also be used within the reservoir site.

<u>Heritage</u>
Our Senior Heritage Officer comments:

Overall, there is still a clear lack of assessment and evidence base that underpins the proposals for the reservoir and the wider infrastructure needed to support its construction and operation. This has been raised repeatedly prior to this consultation and it remains my position that there is insufficient information to inform the proposals to be confident that there will be no harm to heritage assets. Comments are provided below in response to the questions asked and documentation provided to shape further assessment work that is needed to inform the proposals overall. Notwithstanding these comments, it must be noted that significant heritage appraisal and assessment is still needed across the site and wider area more generally.

Q5 – Rail Sidings and Materials handling:
Unlikely to be heritage impacts resulting from the options here. Setting of heritage assets should inform final plans; specifically, Pinmarsh Farm south of the railway line and assets in East Hanney.

Q6 – Construction Access:
Option B is likely to have the least impact on known and designated heritage assets. This will be further removed from Marcham Mill and listed bridge which are already under pressure from regular flooding; increased hard surfacing should be kept away from this area as much as possible.

Q7 – East Hanney to Steventon Road options:
Option A is likely to have a neutral impact on heritage assets, using the existing Hanney Road in Steventon will be a continuation of the current use and is unlikely to result in new harm to heritage assets. If a route which bypasses Steventon (Options B1 and B2) were proposed whilst this may reduce road usage in Steventon, an assessment of the impact of a roundabout junction and light spill would be needed. Light spill impacts of the Hanney end should consider setting of heritage assets.

Q8 – Water Treatment Works:
Options 2 and 4 are likely to have less impact on Marcham Mill and Listed Bridge. This needs further heritage impact assessment.

Q9 – Option B intake/outfall structure:
Options G and H are likely to have significant impacts on heritage assets, particularly noting the pressure for a new road between heritage assets in Culham and potential route changes to the Thames Path. Options on the west side of the river are likely to have less impact on heritage assets subject to suitable control of water outfall to ensure no risk to assets along the river in Sutton Courtenay downstream. Visual impacts from heritage assets on the east side of the river still require heritage impact assessment.

Heritage impact assessment of assets near to the path of and construction area of this tunnel is still needed – specifically assessment of the Grade II listed Stonehill House and Barns and the Sutton Wick settlement site Scheduled Monument on the B4017.

Q10 – Emergency discharge (preferred Option C):
An open canal presents significant potential impacts which are unclear from the information provided so far. It also poses questions about how the canal will be built, serviced, and maintained in readiness for emergency use and what its appearance would be when not in emergency use. The proposed open channel would be constructed near to the Sutton Wick Scheduled Monument and listed Stonehill House and Barns. Not only is impact assessment required to inform all proposals in the setting of these assets, but an open canal here presents questions about how risk to the assets will be managed.

1. If the canal is to be both a functioning canal and emergency channel how deep will it have to be to accommodate extra water in emergencies?
2. If it is a deep channel, how will its appearance contribute to the character of the wider area and setting of assets?
3. Who will maintain it, ensuring no debris or damaged locks could block the path of water in emergency drawdown instances? It appears from proximity of the

channel to assets that emergency drawdown could put heritage assets at risk from flooding.

4. What would the impact of further construction in the floodplain north of the proposed reservoir have on the listed Marcham Mill and bridge which already suffer from the excessive flooding that occurs for prolonged periods throughout the year here?

In heritage terms there is likely to be a strong preference for Option C – the conveyance tunnel. Whilst the principle of a reinstated canal in this area is not objectionable, the dual use as a functioning canal and drawdown emergency channel raises a number of concerns outlined above which the conveyance tunnel does not.

The associated construction impacts for intake and outfall should be assessed for additional construction of a conveyance tunnel noting that these impacts are likely to be the same.

Q11 – Comments on process:
I remain concerned that detailed heritage impact assessment cross referenced to landscape assessment and flood modelling has not informed these proposals.

Q12 Design Principles:
I am concerned that replacement flood storage and reliance on the flood plain north of the proposed reservoir will put significant pressure on the existing floodplain surrounding the listed Marcham Mill and Bridge (adjacent to 'Masterplan Zone 2').

The bridge has only very recently been repaired and the PROW reopened following prolonged periods of flooding which has made repairs and access difficult. The area was flooded for most of the Winter and Spring 2023/2024 and increased use of this area in such close proximity to the listed buildings is a significant concern and it is recommended that specific modelling for all possible scenarios of flooding in this area is done in order to ensure all mitigation and measures to protect the listed buildings are put in place as part of the design and master planning for the scheme.

Steventon village has a very high number of heritage assets and a nationally significant raised Causeway structure which have all suffered from high water table levels and issues of flash flooding in heavy rain which has flooded properties and put the causeway at risk, which has noticeably worsened throughout the past 12 months.

The watercourse diversions and flood replacement storage issues across the site pose a significant risk to heritage assets south-east of the proposed reservoir. Specific modelling for all possible scenarios of flooding in this area (Masterplan Zone 4) should be done in order to ensure all mitigation and measures to protect the listed buildings are put in place as part of the design and master planning for the scheme.

Q13 – Interim masterplan:
I am concerned that replacement flood storage and reliance on the flood plain north of the proposed reservoir will put significant pressure on the existing floodplain surrounding the listed Marcham Mill and Bridge (adjacent to 'Masterplan Zone 2'). The bridge has only very recently been repaired and the PROW reopened following prolonged periods of flooding which has made repairs and access difficult. The area

was flooded for most of the Winter and Spring 2023/2024 and increased use of this area in such close proximity to the listed buildings is a significant concern and it is recommended that specific modelling for all possible scenarios of flooding in this area is done in order to ensure all mitigation and measures to protect the listed buildings are put in place as part of the design and master planning for the scheme.

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Trees

Our Senior Tree Officer comments:

Having reviewed the information available I am generally supportive of the overall (draft) design principles, including 5-S03, 5-S05 and 5-S07 which seek where possible to 'retain valuable landscape and habitat features' including 'existing woodland, trees and hedgerows'. To achieve these principles, it will be essential for detailed tree surveys and arboricultural impact assessments to inform the design layout. It was raised at the recent stakeholder workshop that as little as 20% of the site has been available for site surveys. It will not be possible to determine the overall impact to the existing treescape until full access to the site has been made available and a comprehensive tree survey has been completed.

From a desktop assessment it is clear that most of the identified key master plan zones would require some level of tree loss, in the absence of any detailed tree surveys it is not possible to give any more detailed comments on the presented options. It is clear from the indicative plans at this stage that further infrastructure may need to be incorporated into the design, such as rerouting of existing utilities that run across the site and provision for the replacement of Goose Willow Solar Farm and Landmead Solar Farm. These factors have the potential to lead to further tree loss across the site and reduce the availability of space for landscape planting.

The combined impacts to the treescape are likely to be significant and as highlighted in section 6.5 of the masterplan report, desktop studies indicate the possible loss of ancient/veteran trees. I am generally supportive of the comments within the masterplan seeking the retention of these features. However, as no detailed arboricultural surveys have been completed, we are unable to determine the possible impacts. Only as a last resort should the loss of any ancient/veteran trees be accepted, the mitigation for such a loss would need to make provision to secure the unique conditions required to establish replacements within very long-term management plans.

It will be important to make sure sufficient space is allocated for the planting and establishment of replacement trees, the current masterplan appears quite modest in its current provision for such areas. The planting of trees and woodland would be integral to ensure the proposed reservoir could be successfully integrated into the wider landscape and cannot be understated.

Urban Design
Our Senior Urban Design Officer comments:

Our Joint Design Guide 2022, whilst mostly aimed at minor and major applications for residential and other non-domestic buildings, has some useful principles within the place and setting, the natural environment and climate and sustainability sections which may be relevant for this proposal.

Whilst I can see that a great deal of work has been undertaken to inform the preferred options for several aspects of the proposal, I think that without access to the overall site and the completion of full technical surveys, some of the key design decisions are premature at this stage (such as for instance the zoning areas).

Once the technical surveys have been carried out, present the information following a morphological layers' approach which will help develop the overall design rationale.

The comments below are subject to the findings of technical surveys not yet carried out on landscape, trees, ecology and transport modelling (liaise with OCC):

Q5. Rail sidings and material handling area
I have no specific design comments to make around the location of rail sidings and material handling area from a design point of view and the preferred option seems acceptable considering other constraints identified. It does however encroach into a Local Wildlife Site so comments from the Ecology Officer would be key for this option.

Q6. Road appraisal
I understand the rationale used to inform the option appraisal for the main access road to the reservoir (A415 as a suitable option). Four options were considered for the main access road each joining the A415 with a new roundabout near the Marcham interchange with the A34. Option B has been identified as the preferred option due to road alignment, least potential landscape and visual impacts and falling within the area safeguarded for the proposed reservoir in the current Local Plan. Option B seems a sensible option for the reasons outlined above and could also be used to work in a coordinated approach with future development in the area such as Dalton Barracks. How sustainable each of the options are, needs to feed into the decision for the preferred option. Amount of overall land take also needs to be considered carefully.

Q7. Steventon to East Hanney Road diversion
Four road alignment options have been identified to divert the existing Steventon to East Hanney diversion. Option A seems to be the most sustainable option; however, traffic modelling needs to be carried out for each of these options and liaison with Oxfordshire County Council will be key behind this decision.

Q8. Water treatment works (WTW)
It is recommended that the WTW is located in an area which is the least visually intrusive from a landscape and design point of view and away from / does not conflict with the intended recreational uses of the reservoir when considering noise, potential vibrations and smell associated with it (if any). However, I understand that other technical matters identified partly within the technical brochure would determine the best location for this.

Lighting used for the WTW should emit a soft light and point downwards to minimise glaring lights that are shone into the area/ potential impacts on wildlife (check with landscape and ecology officer).

WTW should be visually screened as far as possible. See Southern Water Peacehaven WTW project.

Q9. Connectivity to the river Thames
Several options are also presented in relation to the connections to the river Thames. It is recommended that the connection to the river has the shortest tunnel length and the shortest diversions for the Abingdon STW outfall and has less impact from a heritage point of view, away from Culham Cut.

The report indicates that the intake / outfall location should be set a suitable separation distance from the Abingdon Sewage Treatment Works outfall for water quality reasons with water quality modelling to be undertaken ahead of Gate 3 to validate the separation distance. The report notes that the outfall 'Oday Ditch' could be diverted if needed to provide required separation. The Council would like to see improved sewage treatment processing and capacity to reduce the risk of combined storm overflows occurring as the preferred option for improving water quality at this location, which should reduce the minimum distance required between the STW outfall and reservoir intake / outfall tunnel.

Q10. Emergency discharge infrastructure
I share similar concerns with the Heritage Officer around what the potential impacts would be from an open canal and what its appearance would be when not in emergency use.

Q12 & 13 Interim masterplan and design principles
Without technical surveys around matters such as landscape, trees, ecology and transport modelling, it feels premature to comment on the zoning proposed presented in the interim masterplan. However, I provide a few pointers, guidance and questions related to urban design which may help develop the scheme further (some of these comments may overlap with other disciplines, so liaising with the relevant technical officer would be necessary).

I welcome that design is considered at the outset of the development process, but key design decisions need to be informed with further technical studies (such as determining where the different zones will be and what has informed each of the zones).

The size of the reservoir means that it presents the potential for many different areas and experiences. The design principles based around five themes (taken from the NIC's design principles for national infrastructure) of Safe and Well, Climate, People, Place and Value are generally acceptable. Each of the seven zones identified within the masterplan also have specific design principles which detail how the design vision and overarching principles will be implemented. It is encouraging to see how the design vision and overarching principles are at the core of the masterplan document and are being translated into the masterplan via more specific design principles. The dialogue between these two elements is welcome.

The interface between the reservoir and the surrounding villages beyond is key to assimilate this development into the landscape. Boundary treatments need to be considered carefully and a section should be dedicated to this. If fencing is required to keep people and animals out of your reservoir, carefully consider where fencing can be located. If fencing is located off the crest there will be far less impact on the landscape (check with Landscape and Ecology Officers).

The embankment slope of 1 in 7 is welcomed. This would allow for the slopes to look naturalistic and blend into the surrounding landscape. The varied sloped gradients proposed would also help integrate the embankments into the surrounding landscape. For more details on this, please liaise with the Landscape Officer.

Are there any overhead power cables to contend with within the reservoir and other related infrastructure?

The replacement flood storage and reliance on the flood plain north of the proposed reservoir will put significant pressure on the existing floodplain surrounding Marcham (Masterplan Zone 2). The watercourse diversions and flood replacement storage issues across the site pose a significant risk to increase existing flooding issues in Steventon village. Therefore, specific modelling for all possible scenarios of flooding in this area (Masterplan Zone 4) should be done in order to ensure all mitigation and measures in place to protect existing Steventon village from further flooding issues.

Locate where on the Ridgeway the views shown in the stakeholder slides are taken from.

Make sure that the plans showing existing and proposed planting are shown in different colours (slide 15 within the stakeholder workshop package, Interim Landscape and Environmental Masterplan). It is currently difficult to differentiate between the two.

Liaise with the Equality Officer moving forward to understand how accessible the development would be for everyone. Provide further principles around inclusivity apart from (4-S2). Make sure that a key part of the masterplan vision is to ensure that the reservoir is accessible to all to promote health and wellbeing.

Involve children and young people as part of future consultation events/ stages.

How many car parks will be provided in relation to the recreational uses?

Priorities should include connecting the reservoir to existing and new communities in the surrounding area and ensuring visitors can access the reservoir using a range of sustainable transport modes. Providing walking and cycling routes, alongside the creation of a high-quality public realm and managed vehicular access, will enhance

the area. Future development should be designed to minimise the need to travel by private car, and maximise opportunities for walking, cycling and public transport. Providing a segregated cycle along the proposed East Hanney and Steventon Road (Masterplan Zone 5) is very much welcomed from an active travel and urban design point of view. Permeability from a pedestrian and cycle point of view is currently poor in the area, therefore the development could potentially present greater connections between the surrounding villages with a range of sustainable modes of transport in mind. This will encourage more people to use active travel to access the reservoir and enjoy the health and wellbeing benefits it has to offer.

The circular route provided around the reservoir should create a continuous high-quality pedestrian and cycling route for all. Make sure that this route provides meandering paths going through different spaces/zones created around the reservoir (avoid Farmoor Reservoir approach to a circular tarmac route). This would provide interest and the opportunity to create different areas that will have different functions as you describe in your consultation documents. The creation of nature trails is welcomed.

Communities should be able to access the reservoir on foot and by bike through entrances that are clearly marked and create a welcoming environment. Pedestrians should have priority and any potential conflict between pedestrians and cyclists at the reservoir should be managed through signage and the design of pathways. Cycle parking facilities should be provided at appropriate entrance points.

Cycle parking for adaptive bikes would be welcomed.

Would cycle hire facilities be explored at suitable locations?

Will cycle and pedestrian be treated separately? If not a shared surface with signage to reduce conflict between pedestrians and cyclists would be needed.

At entrance points around the reservoir there should be lighting to enhance safety, being aware that any lighting should minimise light spill and must not cause an adverse impact on wildlife.

Entrances to the reservoir should be made accessible to all and include features that make the reservoir welcoming such as clear signage and artwork that reflects the identity of the area perhaps (place identity).

Include areas with spaces for people to stop and enjoy the water setting.

A section on the sustainability elements of the proposal should be included within the masterplan documents including the carbon emissions related to the construction of the reservoir, ways in which you'll look to achieve water industry ambitions to be operationally net zero, including exploring opportunities to generate renewable energy at the reservoir.

Incorporate green roofs to any plant and pumping equipment where possible. These structures should be visually screened as far as possible.

Avoid planting trees and shrubs in single lines (unless creating a hedge) as this is likely to draw the eye to the reservoir (Check with Landscape Officer).

I support the comments from the Planning Officer around the missed opportunities for visitor / recreation access direct from Steventon village, Wilts and Berks Canal

restoration and the provision of a new Railway Station at Grove. The Wilts and Berks Canal Trust's aspiration for reinstating the canal should form part of the design to enable full recreational benefits to be realised.

Canal

Page 7 of the technical brochure includes a list of key components and assets required to deliver the project. VWHDC consider that canal construction, within the SESRO site, should be in this list, as restoration of a canal through this area is a priority for the authority. Noting the significant diversion for the canal restoration project due to the historical canal line extending through the centre of the proposed reservoir location, and presence of appropriate machinery to construct the canal already on site, it would be remiss for the project not to also deliver the canal section for which it bisects.

It appears from the interim masterplan that the re-routed rivers to the west of the proposed reservoir cross over the land safeguarded for the canal, while the land safeguarded for the canal is also partly illustrated with flood zone area markings, suggesting that the canal restoration would have two complications for its delivery in the future. Furthermore, the flood zone markings abut the proposed re-routed Steventon to East Hanney road, which is concerning for its future operation during high ground water levels and rainfall.

The canal should also be integrated into the flood risk strategy for the site. Not doing so would likely require considerable retrospective changes to flood management to provide the canal in the future.

Some plans in the consultation documents depict the canal safeguarding stopping at the A34. However, it may be valuable to have the reservoir pipelines beneath an active travel corridor which would have continued access for the forceable future i.e., if the drawdown/uptake pipes were constructed beneath a canal towpath (with canal present or not), access for maintenance and checking of infrastructure could be maintained indefinitely. This strategy would also facilitate a key community benefit of the scheme, by providing an active travel public access route to and from the site directly from southern Abingdon.

Travel

The National Planning Policy Framework (NPPF) sets out that transport issues should be considered from the earliest stages of plan-making and development of proposals (paragraph 108). This enables planning for sustainable travel opportunities to be explored first and prevent the need for retrofitting later in the process.

It should be a high priority for the SESRO scheme layout to promote travel to the site by sustainable modes both by employees, during its construction, and visitors, during its ongoing operation, to prevent it from perpetuating car centric travel behaviours.

Inherently, for the purpose of the reservoir, the location has been chosen that is away from dense urban settlements to limit the impact on residents. However, this also means that the location of the reservoir does not rate highly for access by sustainable transport modes, without suitable mitigations put in place that extend out of the reservoir site, to support the scale of recreational visitors proposed for its

community benefit. Currently it is not clear how well integrated access to existing bus services will be, with regular bus services running along nearby roads, such as the S9 from Grove or East Hanney, X1 from the East Hanney or Marcham, X2 from Drayton, and the rerouted (due to extinguishment of the road by the development) X36 from Steventon to East Hanney road or indeed if additional bus services will be sought.

Access to the site by employees should primarily be planned for by bus, reducing the demand for parking, as well as impact of the site on the operation of the road network. There are regular bus services that stop a short walk distance south of the SESRO site on the A338 (S9 Swindon-Oxford with 3 per hour and X36 Didcot-Harwell with 2 per hour). Pavement provision is available for the entire journey between the existing bus stops up to a railway access on the adjacent side of the A338 to the site. Site boundary changes and pedestrian crossing facilities should be implemented to allow ease of crossing and access into the site on foot in this location. This will also allow future pedestrian access from Wantage and Grove into the SESRO site for recreational and leisure activities. Further access arrangements should be made for access to the site by employees via bus stops in East Hanney, Marcham and Steventon.

As detailed in the consultation materials, visitors would arrive for a range of experiences at the site, but also the scheme should plan for and facilitate visitors arriving via a range of transport modes from a range of directions around the site.

Currently, it is clear that the main visitor access and associated facilities will be via the site's new access to the A415 Marcham Road, which provides a moderately attractive walking and cycling route from Marcham for those travelling from the west and Abingdon for those travelling from the east but does provide an attractive motorised vehicle access. Attractive and welcoming entry points should be provided for all of the walking, cycling, bus and future rail entry points into the site, with clear wayfinding and access routes available for all the relevant activities available to visitors.

The additional car parks to the south-west and south-east of the proposed reservoir should be reviewed and managed also, to encourage access by other modes than the private car. Instead of encouraging local short journeys by car, the scheme should seek to extend walking and cycling infrastructure from the site into these villages.

The car park currently is shown (noting the plan is not to scale) is around 350 metres as the crow flies from the reservoir bank walk. To engender a location where people are catered for, not cars, could the car parking arrangements be located away from the reservoir embankment, closer to the A34 / A415 (while allowing for queuing off of the public highway), permitting only disabled and service vehicle access close to visitor facilities and embankment. This firstly encourages people to take only what they can carry, potentially encouraging people to take their waste away with them, but also improves the experience of those walking and cycling around the reservoir.

The interim masterplan is not to scale, however, as a broad measurement, the scale of the main car park looks to be able to accommodate in the region of 850 cars,

denoted by an area of hardstanding of c.100m x 110m for an estimated 12 rows of 40 cars, as well as an overflow car park of reinforced grass of c.100m x 90m for an estimated 9 rows of 40 cars. This scale of parking is concerning.

Terms for 'PROW' and 'permissive paths' have essentially been referred to interchangeably, however, unless there is a justified operational reason for any of these routes being provided as permissive paths there should be a presumption in favour of routes being provided as PRoW so that they can be available for public use in perpetuity without the landowner being readily able to revoke access.

Considerations for EV charging capabilities on the site should also be considered. Furthermore, solar electric buggies could be available for hire, for those with reduced mobility that would like to enjoy the facilities with greater ease.

Flood Risk

There is a limited amount of information on the baseline flood risk from all sources other than main river flooding.

VWHDC understands that SESRO are reviewing groundwater levels as part of the investigations. This detailed review and linkage with fluvial modelling is critical given the risk of flooding from superficial gravel deposits which currently enable groundwater to flow through the location of the proposed reservoir. It is understood that mitigation is likely required, and VWHDC would like to see the results of modelling and mitigation proposals.

VWHDC would also like to see inundation modelling for post reservoir build and the flood inundation risk at Abingdon, Sutton Courtenay and Culham if overflow goes to the Thames.

The availability of gauge data to benchmark against and check flood modelling results has been raised previously and it is understood that SESRO will be installing additional gauges in the river Ock catchment. VWHDC would like access to the data when it becomes available.

It is noted that the maximum abstraction flow rate from the river Thames will be 13.9m3/s. During recent flooding in Abingdon, the river Ock gauge recorded average river flows of just over 16m3/s on the 5th and 6th January and during the July 2007 flood a maximum flow of 25.9m3/s was recorded. If considering the 2007 flood an abstraction of 13.9m3/s from the river Ock would result in a significant reduction in flood risk and VWHDC would like to see the option of an overflow from the river Ock to the pumping station by the reservoir embankment considered as an alternative flood mitigation scheme.

Sequential and Exception Tests in relation to flood risk will be required, to be considered in detail, and planning policy indicates that wider flood risk benefits to the community should be incorporated should the Sequential Test be considered acceptable.

Summary and conclusion
VWHDC seeks ongoing meaningful engagement with Thames Water but considers that until the WRMP process is complete the preferred option process is premature, as size and need can only be demonstrated from an adopted management plan.

If the reservoir is built as currently proposed, it will be of a volume around 10 times the size of Farmoor reservoir and 10km around the perimeter. It would be the second largest reservoir in England behind Kielder Water which holds 199Mm3 and has two visitor centres attracting 250,000 visitors per year.

Furthermore, VWHDC cannot proactively comment on a wide range of options relating to specific elements of the project in the absence of technical information to make an informed view.

VWHDC therefore maintains an objection given ambiguity on costs, environmental and human impacts and the need for the reservoir not proven through an adopted Water Resources Management Plan (WRMP).

Yours sincerely,

S. Walker

Stuart Walker
Major Applications Team Leader