

Southern Water Draft Water Resources Management Plan Consultation – Southern Water's Response

Question 1 – Our plan includes options to reduce demand (e.g. reducing leaks and encouraging customers to use less water) and increase supply (e.g. building new reservoirs). Do you agree we have struck the right balance between supply and demand measures?

Vale of White Horse's Submission

Vale of White Horse District Council would like to see greater emphasis given to the efficient use of water and the minimisation of wastage. While the council recognises that water efficiency forms a significant part of the draft Water Resources Management Plan (WRMP) up to 2040, we are concerned that from that date forward Southern Water seems to rely more on proposed new sources of supply (including the Thames to Southern Transfer Project) rather than continuing to heavily focus on addressing leakages and waste. Our council would, therefore, request that Southern Water considers introducing more ambitious targets for leakages, reducing average daily water use and non-household water use.

Our council would question the basis for the WRMP's conclusion that by 2075, Southern Water will need to find an additional 587 million litres of drinking water per day. As Southern is already supply 565 million litres of drinking water a day, this seems a very high expected additional need. We are, therefore, requesting that:

- a further sense check is undertaken on the assumed future needs that underly many of the proposals within the WRMP, and
- a greater emphasis is placed on demand management within the WRMP.

Our council has also noted that under the worst-case scenario outlined on pages 18 and 19 of the WRMP the combined figure for the additional litres of drinking water needed per day in 2075 due to the effects of a growing population and the impact of climate change is 330 million – a long-way short of the additional 587 million litres of drinking water per day that Southern Water says it needs to find. Consequently, we are concerned that Southern Water, in an effort to lessen the ecological impact that it has on catchments within its own area, are planning for unnecessary solutions (such as the Thames to Southern Transfer Project) that will have negative environmental effects on catchments within neighbouring regions.

Vale of White Horse District Council has long-standing concerns regarding the use of new strategic reservoirs for meeting water needs. These projects damage the environment, significantly increase carbon emissions, reshape the natural landscape and disrupt local communities. We, therefore, do not see them as an effective way of ensuring future water resilience. Our preference would always be for an intensified focus on demand management including water efficiency (through the tackling of leaks and changes in consumer behaviour) and the increased use of nature-based catchment schemes which help to ensure that more water is retained.

Vale of White Horse District Council would like to specifically caution against any assumptions regarding the Thames to Southern Transfer Project due to its dependency on the development and delivery of the South East Strategic Reservoir Option (SESRO) at Abingdon. While HM Government has recently made announcements regarding the SESRO, it still has to go through the Nationally Significant Infrastructure Project (NSIP)/Development Consent Order (DCO) process. As the future of the proposed reservoir remains uncertain, the council would, therefore, suggest that Southern Water considers alternative options.

Our council also wishes to make clear its opposition to the other major feature of the Thames to Southern Water Transfer Project, the proposed routing of water pipelines across/through the North Wessex Downs National Landscape – the negative/adverse impacts of which cannot be justified.

We would request that Southern Water gives greater emphasis in its WRMP to securing water supplies from within its own region. Transfers from outside should surely be a last resort, once other potential sustainable local solutions (reducing leakages, water recycling, desalination, introducing nature-based catchment schemes) have been exhausted.

Southern Water's Response

We thank Vale of White Horse District Council for taking the time to review our plan and provide feedback.

We have adopted a twin-track approach in planning for the future. This means developing supply-side schemes alongside delivering our ambitious demand management plan. We need to develop supply-side schemes as we cannot meet future supply-demand balance challenges by relying on demand management alone.

Despite aiming to exceed the targets set by the Government on reducing leakage and consumption, we are committed to exploring options that will deliver either greater benefits and/or deliver them earlier. This includes exploring options that may not be in our current plan.

The need for additional water in the future in our plan is not driven by increase in demand only. It's also driven by considering the impacts of climate change on our existing supplies and the need for us to reduce the amount of water we are currently taking from rivers and groundwater in order to protect and enhance the environment.

- As part of our next plan (WRMP29), we will be reassessing all of the factors that influence future supply-demand balance scenarios.*
- We have an ambitious demand management plan, but we will continue to explore opportunities to go further where feasible.*

As mentioned above, the need for additional water in the future is based on increase in demand due to growth as well as the impact of climate and reductions we need to make from our current sources to protect and enhance the environment.

There is no attempt on our behalf to misrepresent the figure for future water needs in order to promote a particular scheme.

The concerns of the Council on reservoirs are noted.

Thames to Southern Transfer (T2ST) is part of our plan. SESRO is the most obvious source to feed this transfer but technically speaking there is no direct one-to-one relationship between T2ST and SESRO. T2ST can be supported by other options as well.

The concerns of the Council on T2ST are noted. As part of scheme development, we will be conducting detailed Environmental Impact Assessments and hold public consultations at various stages.

The concept of regional planning was introduced to encourage integrated planning across a wider region, regardless of water company boundaries, so as to deliver overall benefit to the region as a whole. We have worked with other member companies of the Water Resources South East (WRSE) to deliver a resilient water supply solution for south east England as a whole.

Question 2 – Our plan includes development of new storage options, such as the River Adur Offline Reservoir. Do you support more storage options to provide resilience to droughts?

Storage in our opinion is not the most effective way of providing resilience during droughts. As they rely on rainfall and/or extraction from other water sources they have an inherent vulnerability if there is a longer than expected period of drought/low rainfall.

Moreover, Southern Water's own WRMP (pages 26 and 27) suggests that both desalination and water recycling are more effective measures for addressing water resilience issues during periods of prolonged drought/low rainfall. Water recycling facilities and desalination plants can also more easily be enlarged if additional water resources are required.

Southern Water's Response

We thank Vale of White Horse District Council for taking the time to review our plan and provide feedback.

We agree that reservoirs do not provide resilience in the event of prolonged, multi-year droughts but they nevertheless provide additional resilience in droughts of shorter duration.

Question 3 – To help protect the environment, our plan sets out how we intend to progressively reduce the volumes of water we take from the environment. Do you agree with our plans to reduce the amount of water we take from the environment by 2050?

Vale of White Horse District Council agrees with the need to reduce the amount of water that is taken from the environment. The council strongly supports plans to reduce over-abstraction and to preserve/enhance chalk streams. We believe that it is incumbent upon all water companies to minimise their impact on the natural world and where possible improve the environment.

Southern Water's Response

We thank Vale of White Horse District Council for reviewing our plan and providing feedback.

We are pleased to note that the Council supports reduction in abstractions to preserve and enhance the environment.

Question 4 – Developing new, more sustainable and resilient sources of supply has a financial cost. Do you think we have struck the right balance between cost, resilience and protecting the environment in our plan?

N/A.

Question 5 – Droughts and water scarcity are forecast to become more frequent and severe. Would you support more frequent restrictions, such as temporary use bans and non-essential use bans, on customers' use to improve resilience and reduce the amount of water we take from the environment during droughts?

We would support more frequent restrictions, such as temporary use bans and non-essential use bans, if it reduced the amount of water that was taken from the natural environment during droughts.

Southern Water's Response

We thank Vale of White Horse District Council for its feedback.

We note that the Council supports more frequent implementation water-use restrictions during droughts.

Question 6 – By 2050, the government requires water companies to reduce the amount of water each person uses daily. Currently, each person uses an average of 128 litres per day. Do you support our target of an average of 110 litres per person per day in a dry year, by 2045, five years earlier than the Government requirement?

While Vale of White Horse District Council notes Southern Water's target of reducing the average amount of water used by a person per day from 128 litres to 110 litres, and suggests that consideration is given to introducing more ambitious targets – especially in an area/region classified as being 'water-stressed'. In our draft Joint Local Plan, we have developed Policy CE7 which requires that "All new homes must be designed to high water efficiency standards, with water use not exceeding 100 litres per person per day, or any future tighter standard that may replace this." By working similarly with local authorities in your region, you could also lower future demand, recalculate your future additional needs and cut back on high investment/ high environmental cost proposals in the draft strategy, like the proposed Thames to Southern Transfer Project. We would be happy to assist further in discussions with you and/or local authorities in your region by providing information about our Joint Local Plan policy and the technical studies that support it. Our local plan website is <https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/planning-and-development/local-plan-and-planning-policies/local-plan-2041/>

Southern Water's Response

We thank Vale of White Horse District Council for its feedback and sharing the link to the Joint Local Plan policy.

We are working with local authorities in our supply area and are encouraging them to promote a PCC standard of 85 litres per person per day for all new builds.

Question 7 – In order to meet demand for water in the Hampshire area, we may sometimes have to apply for drought permits/orders to abstract from the River Test during droughts. In order to protect the River Test do you support temporarily importing water from Norway via sea tankers first over the use and reliance on drought orders and permits, which may still be needed?

Although Vale of White Horse District Council recognises the need to preserve, protect and enhance the River Test, we cannot support a scheme that temporarily imports water from Norway. Our council believes that the use of drought orders and permits, while not ideal, is still a more acceptable solution than transporting water from Scandinavia.

Southern Water's Response

We thank Vale of White Horse District Council for its feedback and note its opposition to the sea tankering option.

Question 8 – Our plan includes desalination. Do you support the use of desalination for public supply to improve resilience to droughts and reduce the amount of water we take from the environment?

Southern Water's WRMP suggests desalination offers an effective solution for addressing water resilience issues during periods of prolonged drought/low rainfall. Desalination plants can also be expanded to provide a greater degree of flexibility if additional water resources are required. Furthermore, with the continued decarbonisation of the UK's electricity system there are fewer concerns about the energy intensive nature of the process.

We are, however, concerned about the potential impacts of desalination upon the marine environment. Safeguards would have to be put in place to ensure that the use of desalination did not have a retrograde impact on the marine environment.

Southern Water's Response

We thank Vale of White Horse District Council for its feedback.

We note that the Council is generally supportive of desalination but would like safeguards in place for environmental protection.

We agree with the Council that for desalination to be viable at a given location, the potential environment impacts will need to be appropriately addressed.

Question 9 – Our plan includes schemes involving recycling of water. Do you support the use of recycled water for public supply to improve resilience to droughts and reduce the amount of water we take from the environment?

We support the use of recycled water for public supply. It is a resilient, flexible way of increasing water supplies as demand grows. As Southern Water's WRMP shows, the delivery of four water recycling schemes by 2035 could boost supplies by up to 127 million litres per day – with the potential for further projects going forwards.

Southern Water's Response

We thank Vale of White Horse District Council for its feedback and note its support for water recycling for public water supply purposes

Question 10 – Do you have any other comments on our plan?

Vale of White Horse District Council wishes to make clear our vehement opposition to the proposed Abingdon reservoir (SESRO) and associated pipelines which, as part of the proposed Thames to Southern Transfer Project, would provide Southern Water with up to 120 million litres of water per day from 2040. The Vale does not believe that the case has been made for the SESRO to proceed. Consequently, as the necessity for the reservoir has not been proven, we do not believe that Southern Water should be including it or relying upon it within its own future plans.

The reservoir at Abingdon would, under Thames Water's current proposals, create the second largest reservoir in England. This would have a profound impact on the surrounding landscape and environment of Oxfordshire, the negative effects of which cannot be mitigated. Moreover, the construction and operation of this reservoir will lead to a significant increase in carbon emissions – something that our council cannot support and would be counter to our target to achieve a carbon-neutral district by 2045.

Vale of White Horse District Council also has safety issues regarding the SESRO. Thames Water has so far failed to provide adequate information regarding both the engineering and safety design of their proposals.

Furthermore, although the council in principle supports the concept of transfers between areas (the idea of creating a national grid for water), we do not see the reasoning behind taking supplies from one water-stressed region (Thames) to meet the needs of another water-stressed region

(Southern). Any effective solution for meeting the future needs of Southern Water would, in our opinion, take water from areas with plentiful/abundant supplies.

Our other main concern is that to transfer water from Abingdon to Hampshire will require the construction and routing of water pipelines across/through the North Wessex Downs National Landscape. This will have a negative/adverse impact upon the National Landscape including on natural habitats, ancient woodlands, historic environment, on tranquillity and public opportunity for quiet enjoyment. This is especially pertinent given the fact that we do not believe in the merits of the proposed reservoir or pipeline.

We also do not consider that sufficient weight and focus has been given to national policy in the draft WRMP. National Landscapes are designated at a national level due to their natural beauty and are subject to the highest level of protection. It is essential that any development in or affecting a National Landscape, conserves and enhances its landscape and scenic beauty. The National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing their landscape and scenic beauty, and that the scale and extent of development within National Landscapes should be limited. Major development (which a water transfer pipeline clearly would be) should only be permitted in the National Landscapes in exceptional circumstances. With other strategies and demand management options available, we do not believe this threshold has been met.

Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a legal duty to seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape. This was strengthened in 2023 from a simpler previous requirement to 'have regard' to it. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers. Interim advice from Natural England is that the new duty to 'seek to further' is an active duty, not a passive one. It underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also seeking to further the conservation and enhancement of a protected landscape, which goes beyond mitigation and like for like measures and replacement.

Given the above, the council expresses strong concern about the merits and case for routing a water pipeline associated with the proposed Thames to Southern Transfer Project through the North Wessex Downs National Landscape. This project would be subject to the NSIP/DCO process. Relevant bodies, including Natural England, the North Wessex Downs National Landscape Partnership and Vale of White Horse District Council, should be engaged as stakeholders on the merits of this proposal and as well as any details on route options and construction methods.

In addition, the construction and operation of the proposed pipeline would lead to an increase in carbon emissions – something that the council cannot support.

Southern Water's Response

We thank Vale of White Horse District Council for its feedback.

We note the Council's opposition to SESRO and T2ST. We would like to point out that the Secretary of State for Defra has approved Thames Water's WRMP24, which includes SESRO and Thames to Southern Transfer (T2ST). Both SESRO and T2ST will be subject to further assessments and consultations.

We are unable to comment on the adequacy of Thames Water's consultation on SESRO.

There are no areas of abundant or plentiful water in our region. Regional planning encourages water companies to work together to develop options that benefit a region as a whole.

The Council's view on the potential environmental impacts of the pipeline route from Thames Water to Southern Water, in view of the various policies and acts, is noted. All relevant legislative and planning requirements will need to be met for the project to proceed.