

**OXFORDSHIRE COUNTY COUNCIL RESPONSE
ON WATER RESOURCES CONSULTATION
DRAFT REGIONAL PLAN FOR THE EAST
Consultation closing date: 20th February 2023**

Introduction

1. The County Council is responding to the following consultations:
 - Water Resources East (WRE) draft regional plan consultation¹ (this response)
 - Water Resources South East (WRSE) draft regional plan consultation
 - Water Resources West (WRW) draft regional plan consultation
 - Affinity Water's draft Water Resource Management Plan 24 (WRMP24) consultation
 - Thames Water's draft Water Resource Management Plan 24 (WRMP24) consultation
2. This response on the WRE draft regional plan follows the Oxfordshire County Council response on the emerging regional plan which was sent in February 2022. We responded in March 2022 on the WRSE emerging regional plan and our response on that is available on the County Council's website with a press release². The County Council has also responded on various other consultations over recent years. Oxfordshire County Council has consistently questioned attempts to progress a proposal for a strategic reservoir in Oxfordshire.
3. Oxfordshire County Council appreciates that the WRE regional plan has focused on matters within the Eastern England region, but as stated in our response at the emerging regional plan stage, all the regional groups should be considering how to avoid the need for the scale of reservoir proposed in Oxfordshire, known as the South East Strategic Reservoir Option (SESRO). There are inconsistencies in approach between the regions, for example the Water Resources East draft plan generally looks out to 2050, whereas the Water Resources South East draft plan looks out to 2075, and it could be that this difference has had an impact on the choices made.

Reservoirs in South Lincolnshire and Fenland and transfers from them

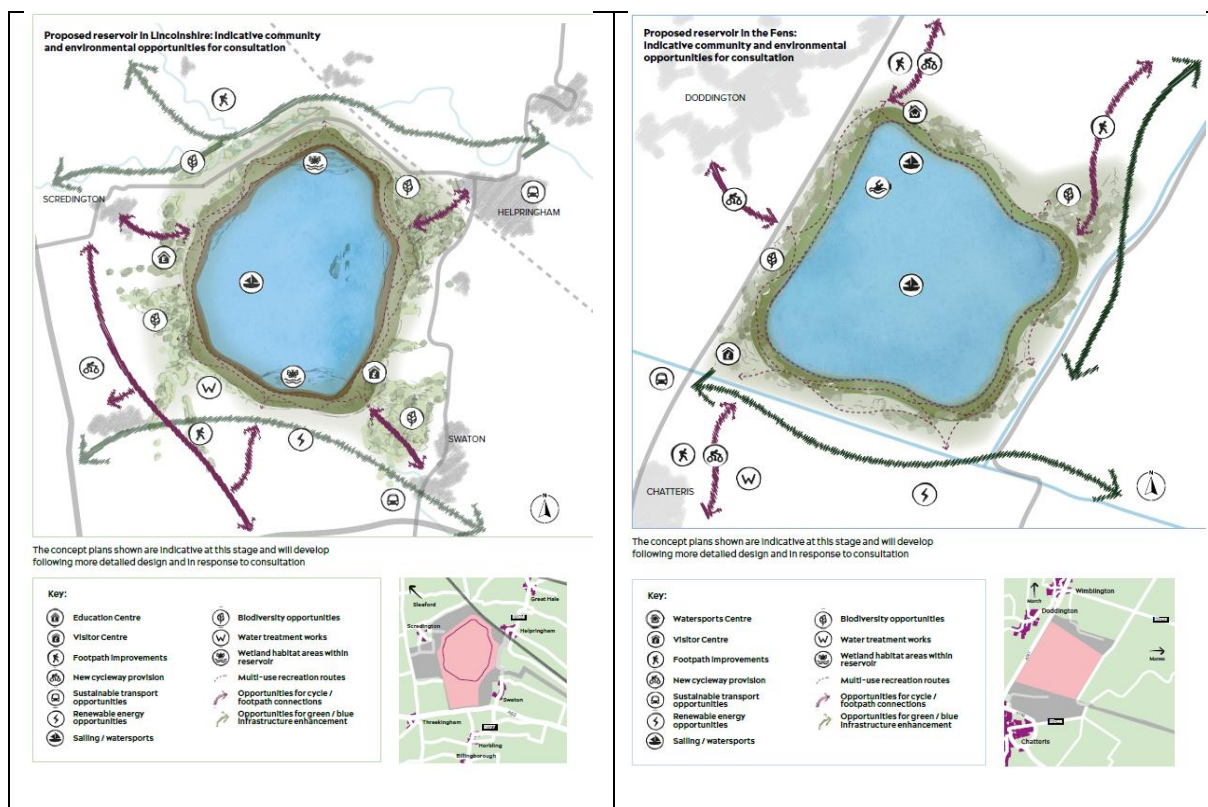
4. Two reservoir proposals in South Lincolnshire and Fenland have progressed significantly since the emerging Water Resources East (WRE) regional plan consultation early in 2022. The individual proposals have been subject to consultations to 21st December 2022 which include the concept plans shown in Figure 1.

¹ <https://wre.org.uk/the-draft-regional-plan/>

² [Oxfordshire County Council calls for giant reservoir plan to be scrapped again](#)

- Both new reservoirs are identified as having the capability to hold 55 Mm³ of water and the sites are in rural areas. The proposed Lincolnshire reservoir location is south-east of Sleaford, the water surface area to be some 5 km², and the deployable output some 166 Ml/day. The proposed Fens reservoir location is north of Chatteris, with a water surface area also of some 5 km², but a deployable output of some 87 Ml/day.

Figure 1: Lincolnshire and Fenland reservoir concept plans³

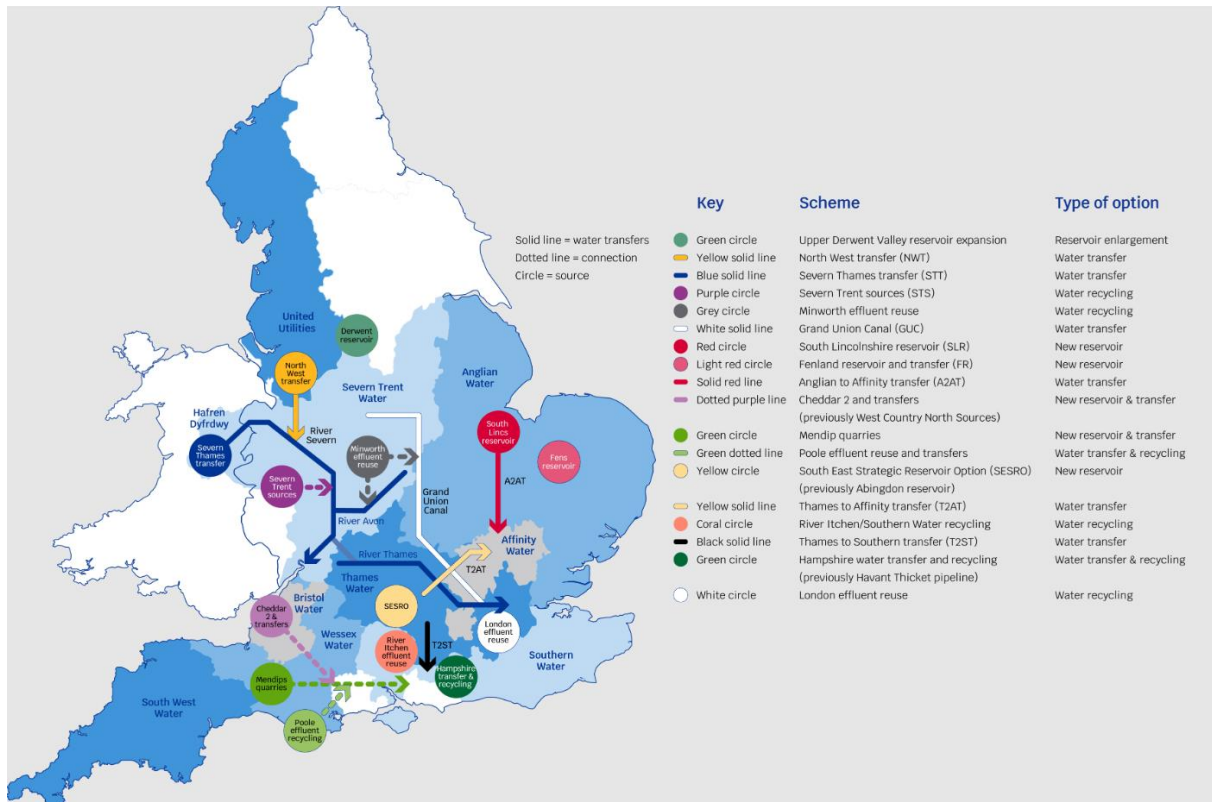


- Both reservoirs are expected in the WRE draft regional plan to be in supply by 2040. A Development Consent Order (DCO) application is expected to be made in 2025 to enable this timeframe.
- Oxfordshire County Council asked at the emerging WRE plan stage that there be a pipeline from Eastern England to Affinity Water in the South East in recognition of these new reservoirs, in particular the ability to transfer water from the Grafham Water reservoir once the new South Lincolnshire reservoir is constructed. Such a pipeline, transferring between 50 Ml/d and 150 Ml/d of potable water is reflected in the strategic resource option known as the Anglian to Affinity Transfer (A2AT) referred to in Figure 2. However, the gate 2 submission from Anglian Water made

³ See: <https://www.fensreservoir.co.uk/our-proposals/our-proposed-site/> and <https://www.lincsreservoir.co.uk/our-proposals/our-proposed-site/>

public in November 2022⁴ makes it clear that they do not want to proceed with the option to transfer water to Affinity Water’s London area. Instead, they want to keep the water in the Water Resources East region. It is therefore the intention that Affinity Water will cease to be a partner, and a pipeline proposal be developed for gate 3 only as far south as Grafham Water in Cambridgeshire. This proposal is reflected in the WRSE and WRE draft regional plans as well as the draft company WRMP24s.

Figure 2: Strategic Water Resource Solutions⁵



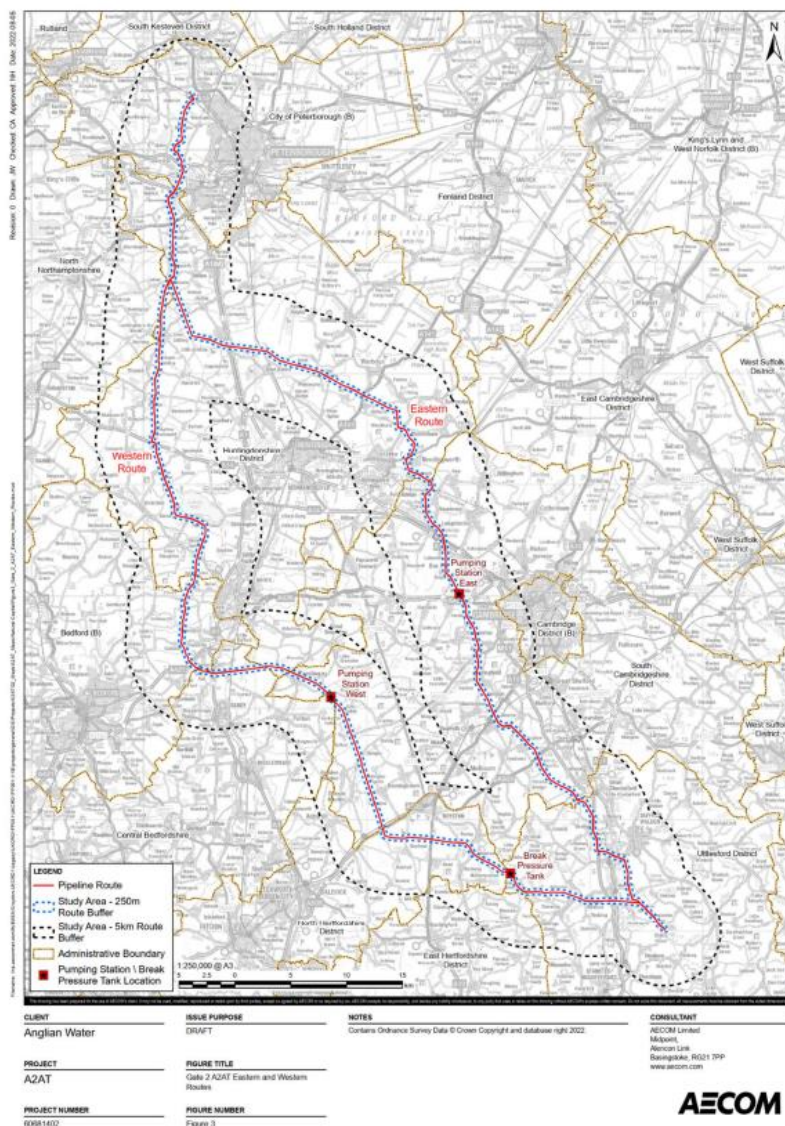
- Oxfordshire County Council does not agree with the recommendation not to pursue a pipeline for the full distance. Such a pipeline would give Affinity Water another potential source of water and reduce the reliance on the schemes delivering water from the Water Resources West region. The A2AT gate 2 submission report acknowledges that a pipeline to Affinity Water would enhance the connectivity and resilience of Affinity Water’s overall supply network. Two route options were considered for gate two, a western and an eastern route, with the western, which links with Grafham Water, appearing to be favoured. Figure 3 shows the two route options.
- The recommendation for a shorter pipeline between Peterborough and Grafham Water is estimated to cost some £276m. The full pipeline proposal had a cost estimate of some £317m to £532m and the work done to gate two indicates that

⁴ See A2AT Gate 2 Submission Report final <https://affinitywater.uk.engagementhq.com/strategic-resource-options>

⁵ Diagram of proposed solutions as at August 2022 <https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/>

the pipeline to Affinity Water’s reservoir hub near Thaxted in Essex is a feasible option. It appears that cost and technical feasibility have not been the reasons for the recommendation not to proceed with the full length of the pipeline. Instead, it appears that the water companies and regional bodies have decided in favour of the SESRO and STT to help with Affinity Water’s requirements rather than the A2AT. (In all cases Affinity Water also requires the GUC transfer of water.) For the reasons set out in our response on the WRSE draft regional plan, Oxfordshire County Council does not agree with the proposal to progress the SESRO. The A2AT could be part of a solution to avoid the need for the SESRO as some of Affinity Water’s needs could be met from this source. The regional and company plans should be amended to provide for the A2AT north-south transfer all the way to the Affinity Water hub.

Figure 3: Map of Anglian to Affinity Transfer pipeline route options⁶



⁶ See Figure 3 of A2AT Natural Capital Assessment report <https://affinitywater.uk.engagementhq.com/strategic-resource-options>

Other Matters

10. We are generally supportive of the other proposals for water supply in the draft WRE plan including the provision for water recycling and desalination schemes.
11. We agree that water companies need to plan for sufficient water supply but consider the amount of additional water need being forecast is likely to be excessive. This is because the population forecasts are likely to be too high; the calculation of the amount of abstraction that needs to be reduced is likely to be too high; and more can be achieved through leakage reduction and reductions in individual water use.
12. We refer you to our response on the Water Resources South East regional plan consultation, attached as Appendix 1.

Conclusion

13. Changes should be made to the WRE regional plan, together with changes to the WRSE regional plan, including addressing the following key point:
 - A pipeline should be provided for north-south from the Water Resources East area to the Water Resources South East area enabling a transfer of water between Anglian Water and Affinity Water (A2AT), to supply water from around 2040.

Appendix 1

Copy of Oxfordshire County Council response on WRSE draft regional plan

(To be added)