

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

Introduction

1. Oxfordshire County Council is responding to the following consultations:
 - Affinity Water's draft Water Resource Management Plan 24 (WRMP24) consultation¹ (this response)
 - Water Resources South East (WRSE) draft regional plan consultation
 - Water Resources West (WRW) draft regional plan consultation
 - Water Resources East (WRE) draft regional plan consultation
 - Thames Water's draft Water Resource Management Plan 24 (WRMP24) consultation
2. Water Resources Management Plans are statutory plans prepared by water companies every five years. The last ones were dated 2019 i.e. WRMP19. These next ones will be dated 2024 i.e. WRMP24. Oxfordshire County Council commented on the draft Affinity Water WRMP19 in April 2019. We raised concerns, particularly about the proposal for a South East Strategic Reservoir Option (SESRO) in Oxfordshire to partly meet Affinity Water's future needs. We sought a public inquiry on the Affinity Water and Thames Water WRMP19s, but that did not materialise, and the WRMP19s were eventually agreed by the Secretary of State.
3. During the development of the WRMP19s there was no regional planning process. Since then, regional water resources plans (which are non-statutory) have been developed and are also being consulted on at the moment. The draft WRMP24s are designed to be consistent with the draft regional plans.
4. Oxfordshire County Council has responded on various consultations over recent years as part of the regional planning process. We are responding to the current Water Resources South East consultation, and our response to that is Appendix 1 to this response, and therefore forms part of this response on the Affinity Water WRMP24.
5. Affinity Water does not supply water to Oxfordshire (Thames Water is the main supplier in Oxfordshire). Oxfordshire County Council's interest in responding to the Affinity Water WRMP24 is that Affinity Water is a partner with Thames Water in promoting the SESRO. Oxfordshire County Council has consistently questioned including the SESRO in the plans.

¹ <https://affinitywater.uk.engagementhq.com/wrmp>

Strategic Water Resource Solutions

Figure 1: Affinity Water Strategic Resource Options²



6. Figure 1 shows the Affinity Water areas and the various strategic resource options of the Grand Union Canal Transfer (GUC) sourced by Minworth Treatment Works; the Thames to Affinity Transfer from the west (T2AT) sourced by the South East Strategic Reservoir Option (SESRO); and the Anglian to Affinity Transfer (A2AT) sourced by a South Lincolnshire reservoir.
7. The key elements of the WRSE regional plan for Affinity Water are described in the draft WRMP24 as³: internal transfers between Affinity's Water Resource Zones (WRZ); the GUC; the SESRO; and the T2AT.
8. These schemes are discussed in our response to the Water Resources South East consultation in Appendix 1 and additional comments are made below.

² Map from Page 21 of Affinity Water draft Water Resources Management Plan 2024 summary document <https://affinitywater.uk.engagementhq.com/wrmp>

³ Table 9.5 and text of Affinity Water draft Water Resources Management Plan main document <https://affinitywater.uk.engagementhq.com/wrmp>

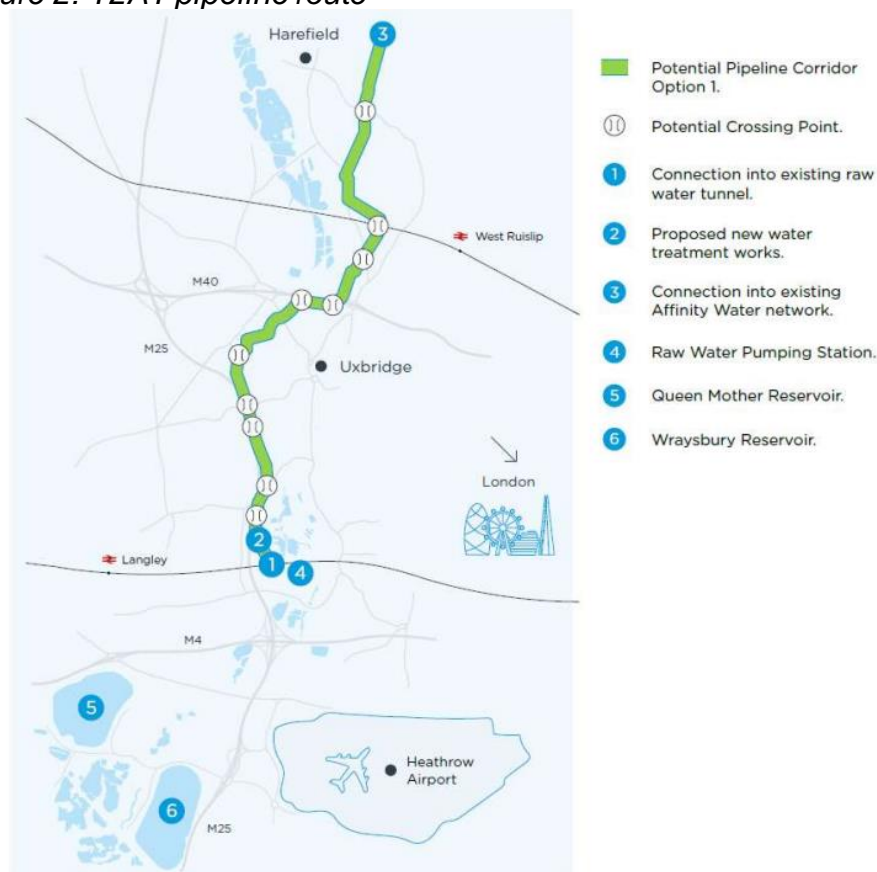
The Grand Union Canal Transfer (GUC)

- Affinity Water proposes to get some 100Ml/d of water from a Grand Union Canal Transfer (GUC). As per Appendix 1, Oxfordshire County Council supports the GUC proposal and its early phasing.

The South East Strategic Reservoir Option (SESRO)

- Affinity Water proposes to get some 100Ml/d of water via a transfer from Thames Water using water in the River Thames. Either the SESRO or another scheme, the Severn Thames Transfer, discussed below, are understood to be needed to achieve this. The transfer is known as the Thames to Affinity Transfer (T2AT). The gate 2 documents submitted in November 2022 indicate that the likely location of a pipeline between the River Thames and the Affinity Water area dependent on SESRO, would be from a location near Slough, travelling then 14km north to the Harefield area to connect into the network. The Affinity Water WRMP24 shows a west-east route on the diagram in its summary document labelled '4a' as shown on Figure 1, however we assume this is out of date and it is the south-north route on the diagram in the gate 2 documents which is more correct, copied as Figure 2.

Figure 2: T2AT pipeline route⁴



⁴ Pipeline route diagram from T2AT Gate 2 Main report v3 final <https://affinitywater.uk.engagementhq.com/strategic-resource-options>

11. As per Appendix 1, Oxfordshire County Council has identified concerns in relation to the SESRO and associated transfers; and considers that the SESRO should be removed from the regional plan and the company plans.
12. Affinity Water has set out in its draft WRMP24 what is required if SESRO is not progressed: the GUC; the eastern Thames to Affinity Transfer (shown as '4b' on Figure 1); the Thames Water Teddington DRA water recycling scheme and the Severn to Thames Transfer⁵. Oxfordshire County Council would support this alternative.

Severn to Thames Transfer (STT)

13. The Severn to Thames Transfer (STT) does not directly involve Affinity Water but is referred to in the draft WRMP24⁶: 'In all but the very least challenging situation (low growth and low environmental destination) there is a need for a second strategic scheme in 2040. The main alternative to the preferred option (SESRO) that could be used by Affinity Water are the supported elements of the Severn Thames Transfer'. As per Appendix 1, Oxfordshire County Council considers that the STT proposal should be brought forward in time, and that will enable the T2AT to proceed without the SESRO.

Reservoirs in South Lincolnshire and Fenland and transfers from them

14. Affinity Water could potentially get treated water via a new pipeline transfer from Anglian Water in the north but the draft regional plans and this draft WRMP24 propose not to. There are two reservoir proposals in South Lincolnshire and Fenland which are expected in the WRE draft regional plan to be in supply by 2040. A pipeline to Affinity Water in the South East could transfer water from the Grafham Water reservoir once the new South Lincolnshire reservoir is constructed (or transfer water directly). Such a pipeline, transferring between 50 MI/d and 150 MI/d of potable water is reflected in the strategic resource option known as the Anglian to Affinity Transfer (A2AT) shown in Figure 1 of this response. However, the gate 2 submission from Anglian Water made public in November 2022 makes it clear⁷ 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.
15. The draft Affinity Water WRMP24 discusses the A2AT north-south transfer all the way to the Affinity Water hub in the discussion from paragraphs 7.39 to 7.42 in the document. At paragraph 9.44 and in table 9.8 of the document, it is noted that such

⁵ Page 194 of Affinity Water draft Water Resources Management Plan main document <https://affinitywater.uk.engagementhq.com/wrmp>

⁶ Page 175 of Affinity Water draft Water Resources Management Plan main document <https://affinitywater.uk.engagementhq.com/wrmp>

⁷ See A2AT Gate 2 Submission Report final <https://affinitywater.uk.engagementhq.com/strategic-resource-options>

a transfer would be needed if SESRO is not progressed. The information in the draft plan records how modelling was undertaken, and Table 9.10 sets out the summary of strategic implications which were identified from the various options modelled.

16. As per Appendix 1, 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 and/or the SESRO. 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. 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.

Calculation of water need and policies

17. Oxfordshire County Council does not accept the forecast water need figures upon which the WRSE draft regional plan and this WRMP24 is based. The arguments against the forecasts are set out in our response to the WRSE consultation draft plan which is included as Appendix 1 to this response. We expect changes to be made at the regional level and cascaded to the WRMP24s.

Options that don't involve new infrastructure

18. As per Appendix 1, Oxfordshire County Council expects Affinity Water and the other water companies to work more to reduce leakage and individual per capita consumption. This will help reduce the need for new strategic infrastructure.

Water Recycling

19. As per Appendix 1, Oxfordshire County Council supports the proposals for more water recycling schemes across the South East. It appears that the GUC scheme is the only Affinity Water scheme sourced by recycled water. The draft WRMP24 states⁸: 'Although we have concentrated on the schemes used for Affinity Water, the selection and sizing of schemes that affect our Central communities also affect Thames Water and Southern Water. All three companies use SESRO as a key strategic resource under the cost-efficient plan, with the Thames to Southern Transfer affecting the resource position and reliance on schemes such as the Hampshire Water Transfer and Water Recycling Project to Havant Thicket water recycling scheme in Hampshire. Similarly, the amount of water available to us from SESRO affects our usage of water recycling schemes in the Thames basin (Teddington or Beckton). In the cost-efficient plan, we do not need these schemes

⁸ Text in box on page 167 of draft Water Resources Management Plan main document
<https://affinitywater.uk.engagementhq.com/wrmp>

to address growth or environmental destination, but these start to form key sources of water for us if WRSE starts to look at alternatives to the SESRO scheme.' Oxfordshire County Council considers that water recycling schemes should become key sources of water as alternatives to the SESRO scheme.

Desalination

20. As per Appendix 1, Oxfordshire County Council supports the inclusion of relatively small-scale desalination schemes as an innovative response to water supply issues.

Conclusion

21. Changes should be made to the Affinity Water WRMP24, along with changes to the WRSE regional plan and the WRE regional plan, including addressing the following key points:

- 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.
- The SESRO should be removed from the plans and not pursued as a strategic resource option.

Appendix 1

Copy of Oxfordshire County Council response on WRSE draft regional plan

(To be added)