

A Response to Thames Water's Consultation on the Upper Thames Major Resource Development

CPRE Oxfordshire, 6 November 2006

1. Response to UTMRD: "Stage 1: Needs and Alternatives"

We provide our outline opinion below. Any comments made here do not prejudice detailed comments we may make at a later stage.

We believe that the case for the reservoir is not proven. Moreover, we believe that Thames Water's pursuit of a reservoir at this stage is distracting the company from its most important objectives of reducing water consumption and stemming leakage. The strategic issue of water supply is one facing the South East as a whole, and needs to be debated and decided in a national framework, not on the basis of a specific proposal from a single company.

2. Regional and national perspectives

Water supply is a national and regional issue, as well as a concern for the Thames Basin. The Needs and Alternatives study rules out consideration of, for example, a national water grid because "implementation would go beyond Thames Water's remit" (Table 4.1) We are concerned that by focusing only on its own area, Thames Water's view of needs and alternatives has become introverted, and too focused on its own business model. This approach leaves very little scope for the formulation of a genuinely unified, region-wide resource management strategy; one that will be the most environmentally sustainable option. This narrow view is not in the best interests of customers or the environment. The Environment Agency is preparing a new Water Resources Strategy for 2008, and only when this has been produced will it be possible to examine this proposal in its national context.

3. The Consultation Process

The timescale for consultation is too rushed; the consultation process is flawed and too geared towards public relations.

1. **Environment Agency.** We are concerned that, in particular, the Environment Agency has not been given sufficient time to consider the case presented. Thames Water has said that it will allow the Agency more time than other consultees to respond. If it is possible to grant an extension for one consultee, why has this facility not been extended to all other parties? If Thames Water's claim that the 9 November deadline is essential to allow the Spring 2007 stage of the consultation to go ahead is correct, then how can the Agency's views, submitted after 9 November, be fully taken into account? Thames Water should ensure that adequate time is provided for analysis and comment by the Environment Agency, before the company proceeds to implement Stage 2 of the consultation.
2. **Pro-forma responses.** Thames Water's decision to limit the responses from citizens to a pro-forma feedback form limits the range and detail of comments individuals can make on the proposal. The feedback form itself is too much concerned with whether Thames Water's has got its message across (questions 1.2 & 1.3) and less with "Needs and Alternatives". As the SCSI makes clear (5.4.1), the purpose is to "feed into the development of the scheme", not to examine Needs and Alternatives.
3. **Limited information.** The Exhibition was not made available on the Internet; neither was the pro-forma feedback form.
4. **Purpose.** We are concerned that many of the public may believe that the consultation is part of the formal planning process—akin to that accompanying the Local Development Frameworks—rather than a consultation for Thames Water's internal use to improve its case for the reservoir.

In summary, we believe the consultation to be flawed and is designed more as a public relations exercise than as an effective way of surveying public opinion on Needs and Alternatives.

4. Environmental impact

Thames Water is pushing this proposal forward before an adequate assessment of the environment impacts that a project of this scale will have on the Oxfordshire countryside and the Thames Basin. It is essential that an Environmental Impact Assessment for any reservoir is conducted at the earliest stage. This should examine the wider strategic issues across the Thames Basin as well as site-specific issues. Thames Water must carry out appropriate assessment of impacts under Articles 6.3 & 6.4 of the EU Habitats Directive wherever the ecology is affected by the River Thames.

5. Leakage

Rates of water loss in the Thames area are too high. Thames Water loses 894 million litres a day through leakage and has yet to meet any Ofwat targets for leakage reduction. Reduction of leakage of clean, drinkable water has to be the company's main priority.

6. Water efficiency

Water companies in the South East predict that water use will rise from 164 litres to 180 litres per person per day by 2030. We, in common with the Environment Agency, do not believe it necessary or acceptable to plan for such a per capita increase and believe that Thames Water should concentrate on reducing consumption.

The Needs and Alternatives report is timid on water efficiency measures. This view is outdated, and does not take into account changes in customer behaviour that will result from increased charges for water and growing environmental awareness. We expect Thames Water to encourage high water efficiency standards through:

- a. Systematic engagement with Local Development Frameworks to ensure that the highest standards of water efficiency are incorporated.
- b. Scrutiny of development proposals to ensure that the highest standards of water efficiency are maintained. Houses built to Ecohomes "very good" can cut water consumption by up to two-fifths.
- c. Promotion of water efficiency in existing households, through technologies such as dual flush and mechanisms such as water audits. More efficient households can use a quarter less water, reducing water bills as well as demand on water supply.
- d. Instigation of a programme of compulsory water metering to all homes in its area, and investigating mechanisms for metering shared occupancy dwellings, such as flats. Compulsory metering may require changes to the regulatory regime and Thames Water should support and encourage this.

Thames Water should set itself a target of reducing personal water consumption to at least the national average of 150 l/h/d, and not plan for increased usage. Even maintaining current usage levels of 164 l/h/d would reduce future demand in the South East by 300 Ml/d.

7. Needs and Alternatives

We believe that if Thames Water adequately and ambitiously addresses leakage and water efficiency, and if its proposal is examined alongside other schemes in the South East, the UTMRD will be found to be unnecessary. Prior to an examination of all supply schemes proposed for the South East, it cannot be at this stage said whether a smaller supply scheme will be needed within Oxfordshire, what the nature of that scheme might be and where it might be located.