



The countryside charity
Oxfordshire

Campaigning to protect our rural county

11 January 2024

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Rt Hon Steve Barclay MP

Secretary of State for Environment, Food and Rural Affairs

Water Resources Management Plan Water Services
Department for Environment, Food and Rural Affairs (DEFRA)
Seacole Building
3rd Floor
2 Marsham Street
London
SW1P 4DF

By email: water.resources@defra.gov.uk

Dear Secretary of State,

CPRE Oxfordshire calls for a Public Inquiry into the draft Water Resources Management Plans (dWRMPs) of Thames Water, Southern Water and Affinity Water and draft Regional Plan of Water Resources South East

On 31 August 2023, the water companies submitted their revised dWRMPs, Regional Plan, and accompanying Statement of Responses to your predecessor, Rt Hon Thérèse Coffey, for approval in accordance with the Water Industry Act 1991 and the Water Resources Management Plan Regulations 2007. The dWRMPs of Affinity Water and Southern Water, and the draft Regional Plan of WRSE were consulted on between 14 November 2022 and 20 February 2023. Thames Water consulted on their dWRMP slightly later, between 13 December 2022 and 21 March 2023. CPRE responded to these consultations expressing our concerns about the need for the proposed South East Strategic Reservoir Option (SESRO) and the transparency and impartiality of the assessment process.

We understand that you are in the process of reviewing the revised dWRMPs, draft Regional Plan, accompanying Statement of Responses and the representations made as well as technical advice from the Environment Agency and Ofwat, and are considering whether or not the dWRMPs and Regional Plan can be published, or whether there are any modifications that must be made.

You will be aware that under Regulation 5 of the 2007 Regulations, the Secretary of State may cause an inquiry or other hearing to be held in connection with a dWRMP. The Water Resources Planning Guideline states, at paragraph 3.8, that if a WRMP has unresolved issues or significant public interest then there may need to be a public hearing, inquiry or examination in public.



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CPRE Oxfordshire contends that there are indeed unresolved issues over the plans for SESRO and, it hardly needs stating, that the construction of a large reservoir within the densely populated south-east is of considerable public interest.

To briefly summarise CPRE's concerns:

1. The future demand scenario presented in the dWRMPs exaggerates future demand – by using unrealistic population projections, an exaggerated, blanket reduction in groundwater extraction and an outdated and unrealistic 'business as usual' climate change scenario.
2. The dWRMP ignores the considerable uncertainties in these projections and hence the risks in initiating a large capital project, such as SESRO.
3. A lack of ambition in reduction of leakage and per capita water usage.
4. An insufficient consideration of alternatives (such as water transfers and desalinisation).
5. A flawed Strategic Environmental Assessment.

CPRE has expressed these concerns during the consultations outlined above but we do not feel they have been adequately addressed. We would therefore contend these are 'unresolved issues'.

Over the last two decades CPRE Oxfordshire has worked closely with the campaign group of local residents, the Group Against Reservoir Development (GARD). In GARD's submission to you, dated 19 December 2023, they lay out in detail many of these concerns about unresolved issues and the case for a Public Inquiry.

CPRE Oxfordshire therefore calls for an independent public inquiry to determine the need and impact of SESRO.

Yours sincerely

Richard Harding

Richard Harding
Chair, CPRE Oxfordshire