



The countryside charity  
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SESRO@ipsos.com

12 August 2024

Dear sir/ madam,

## **Re : CPRE Oxfordshire response: South East Strategic Reservoir Option (SESRO): Our interim master plan and design options Public consultation, Summer 2024**

CPRE Oxfordshire welcome the opportunity to contribute to this consultation. We have provided a full written response as we consider the consultation questionnaire is of limited extent. It provides no easy way of expressing views on the most important topics for local people , namely:

- why is the reservoir needed at all?
- the water quality of the reservoir,
- the safety and flood risk, and
- the local impacts during construction.

### **The need for the reservoir is unproven.**

CPRE Oxfordshire does not believe the need for the reservoir has been proven. As we outlined in our responses to earlier consultations, we have doubts about the excessive population projections used for the SE, the extreme climate change projection used (RCP8.5, which it is now recommended not to use) and the exaggerated 'one size fits all' approach to discontinuing groundwater extraction to protect the chalk streams.

In addition, we do not believe it been established that the Reservoir would be resilient to droughts, in contrast to other options, such as Severn- Thames transfers or water recycling. The Thames Valley is a water stressed area but this reservoir brings no new water into the catchment. Indeed, the proposals to pump substantial water out of the catchment to Southern Water region will only exacerbate the water stress.

Given the immense uncertainties in all the demand projections **we would urge that solutions are found which are scalable and flexible** – clearly the construction of a single, large reservoir to fulfil all the needs of water for the SE is neither scalable nor flexible (adaptive). Thus, we do not believe that the proposed reservoir is the best value, nor the most sustainable, option for the people of the South East.



### **Detail is lacking on the water quality of the reservoir.**

The consultation documents contain no detail on how water quality in the reservoir will be managed. The intake will be downstream of the sewage treatment outlets of Swindon, Oxford and Abingdon. There are well documented water quality problems in this area. For instance, in 2023, the Sandford-on-Thames combined sewer overflow, a short distance upstream of the proposed intake, operated 133 times for 2095 hours, equivalent to 87 days continuously. These periods of sewer spill are likely to be in periods following high rainfall and flow, the only periods when pumping into the reservoir will be allowed.

Above Oxford, the Thames and the Farmoor Reservoir suffer from poor water quality and algal blooms. For example, in winter 2023/24, inflows to the reservoir had to be restricted for extended periods due to poor water quality. Farmoor also has continuous substantial outflow to supply and regular inflows to keep the reservoir water moving. This flexibility will not be available for filling SESRO. The SESRO reservoir will be more prone to algal blooms than Farmoor, because filling the reservoir is restricted to times of above average river flow and because it is a 'strategic back-up' reservoir there will be long periods of minimal inflow and outflow to the reservoir. We repeat, **there is little in these consultation documents, nor in previous, about how the water quality issues in the reservoir will be managed.**

### **Flood risk and safety analysis is inadequate.**

Flooding is a serious issue in Oxford City and the wider Oxfordshire. The analysis of the flood risks seem completely inadequate (question 10): Key questions remain unanswered, for example:

- what is the impact of this large weight of water on the local groundwater?
- have the impacts on river flows and biodiversity of the emergency drawdown been comprehensively modelled?
- what are the operating rules (particularly in the runup to wet weather)? and
- what security restrictions will be put in place?

These are all questions to which we are left wondering. As far as we can gauge no above ground reservoir of this type and size has even been constructed in, at least, Europe (and the exhibition staff were unable to identify anything worldwide). This suggests extreme caution needs to be exercised in the planning and design of this enterprise.

### **Local impacts during construction are underestimated.**

CPRE recognises the massive environmental damage a construction of this size will do to the immediate and surrounding area. The survey and analysis of the biodiversity on the site has been inadequate and underestimates its true extent. The analysis of the carbon footprint of the construction has been underplayed – with a full analysis of the scope 3 greenhouse gas emission missing, the emissions from the quarrying and transport of millions of tons of embankment material underplayed and omission of the methane emissions from the completed reservoir. **We are very concerned that a full Environmental Impact Assessment has yet to be completed.**



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The full amount of imported materials seems unclear. The report on the Rail Sidings fails to mention the scale of the total tonnage of materials being brought in nor the need for storage during construction. We need to know details of this before we can comment which option might be preferable (Questions 5,6 and 7) but it is clear this will be immensely disruptive whichever option is used. We might be talking of 3000 trains over 3 years and hundreds of thousands of lorry journeys, an enormously disruptive operation. Thames Water need to provide a comprehensive design and quantification of the construction so we can see clearly the full extent of the disruption in Oxfordshire and at the source region of this material.

### **In conclusion:**

These criticisms have been repeatedly made by us (and others), for example in the 2023 consultation on the TW dWRMP24, we do not believe these points have been seriously addressed by TW. Indeed, we note that **the Environment Agency have advised the Secretary of State that your plans should not be approved**. The critique from the EA should have been addressed before launching this spurious consultation.

Given the huge uncertainties and risks in this project **CPRE Oxfordshire call for a Public Inquiry**, as demanded by GARD and many local MPs, councils and campaign groups.

Yours faithfully,

Professor Richard Harding  
Honorary Water Advisor, CPRE Oxfordshire