

Water Resources Management Plan (WRMP) 2024

Consultation Response to Thames Water from the Ock Catchment Partnership

Q1. Our approach to improve the environment

We've chosen to aim for the highest level of environmental improvements. This is supported by our regulators. We'll be tracking the benefits of our work as we carry it out and will adapt our approach as we learn more. Do you have any comments on our approach?

The Ock Catchment Partnership (OCP) welcomes the proposal to aim for the highest level of environmental improvements to sustain flows in groundwater fed springs, headwaters, streams and rivers, especially chalk streams. This will become increasingly important with more frequent and longer droughts due to climate destabilisation exerting pressure on water resources. The OCP supported the closure of the Childrey Warren Water Treatment Works, which ceased abstraction of 4.5 million l/day and has supported sustaining flows on the Letcombe Brook chalk stream.

However, we wish to draw attention to:

- i. It is difficult to usefully comment on or offer proposals for locations for reductions in abstraction as it is unclear from the data provided in the WRMP and supporting documents what existing abstraction is currently being undertaken by Thames Water from the groundwater bodies in the Ock (the Vale of White Horse Chalk and the Shrivenham Corallian Water Body) and from the river network.
- ii. The apparent omission in the WRMP of current and future water abstraction from non-Thames Water activities, for example for agriculture, power and industry licenced by the Environment Agency. This data needs to be factored into the approach to achieve the highest level of environmental improvements.
- iii. The damage wrought on the ecology of the Ock's rivers by the continuing discharge of untreated sewage from storm overflows due to inadequate treatment capacity, population growth and the worsening impacts of climate destabilisation. Whilst the WRMP is focussed on water resources, a goal for the highest level of environmental improvements cannot be set without acknowledging that this will not be achieved by abstraction limits alone; substantial and sustained investment in sewage treatment infrastructure is also required. The WRMP needs to clarify how it will achieve its goals in tandem with the Drainage and Wastewater Management Plan and vice versa.
- iv. Seeking high environmental improvement is welcomed, but it should not be achieved in the Thames Region if it then results in a net loss of biodiversity within or outside the region or a net increase in carbon emissions associated with construction and operation of major infrastructure. These are conceivable outcomes of major water supply solutions e.g. water transfer options from distant regions and major new water storage infrastructure.

Q2. Working towards the national target for water use

We've set out our plan for reducing demand, with government interventions, to achieve 123 litres of water per person per day on average. This is above the government's national target, but we think it's the right approach. We'll monitor and develop this by building on our learnings and evidence. Do you have any comments on our approach or suggestions for additional measures we could take?

Clean water is a precious resource and as shown in the WRMP forecasts, demand is likely to increase with a growing population and increasingly erratic and unreliable distribution of rainfall geographically and temporally across the region. Scenarios of flipping from drought to flood in rapid succession are likely to pose increasing threats to water resources and the natural freshwater environment.

Given this fact, reducing demand of a scarce resource per person must form part of future water resource management in the region. Whilst acknowledging that Thames Water are best placed to determine realistic levels of demand amongst their customers, the OCP feels it is disappointing that Thames Water do not aspire to meet the Government target. The OCP would appreciate in the WRMP summary:

- i. a concise explanation of why the Thames region is different to the rest of the UK such that an unambitious target for reducing demand has been set
- ii. insight into why Thames Water think the Government has set the target too high
- iii. clarity on why this target only relates to individual customers and not business and industry. Are their separate targets for tackling these users? How much water does industry and business use as a proportion of total demand and how does Thames Water evaluate what is a reasonable demand from these sectors?

Q3. Our approach to reducing demand for water

Measures to reduce demand for water make up over 50% of our forecast shortfall by 2050. Some of the activity is untested and not within our direct control. Do you think this is the right approach? Should we plan for additional new sources of water in case these measures don't deliver the water we've forecast?

The OCP supports the proposed demand measures. However, it considers that the demand reduction elements in the WRMP should be more ambitious, in particular tackling leakage of clean, treated water from the distribution network. Our key asks for changes to the WRMP are:

- i. **Get ambitious with stopping leaks.** Even if the 50% leakage reduction target is achieved by 2050, it still means that some 12% of all treated water is forecast to be lost to leaks. If these were resolved it would remove fully the requirement to find an extra 432 million litres/day by 2050 (12% of 3.6 billion litres/day). The amount of energy, embedded carbon and money involved in treating and transporting clean water to customers means that the absolute number one priority of the WRMP should be in minimising leakage. This needs to be of higher prominence and have the first call on investment funding before new water supply infrastructure.
- ii. **Tackle water usage from business, industry and agriculture** by working with these sectors to understand where opportunities for reducing demand exist and co-investing with business in water efficiency measures. These sectors are perhaps better placed to pilot novel water tariffs to influence water usage than domestic customers. For example rewarding customers who reduce demand during periods of water supply stress in return for earning future time-limited lower tariffs to be redeemed when supply is secure.

- iii. **Substantially increasing financial support and advice to domestic customers** to make better use of grey water, reducing flood risk and supporting biodiversity through rain gardens, water storage and increasing the permeability of urban areas on a catchment wide scale.

Q4. The size of a proposed new reservoir

A new reservoir is an integral part of our best value plan for the South East. Do you have any comments on the size of a new reservoir?

The proposed reservoir is within the Ock Catchment and there are a range of views from members of the OCP. Local communities near the proposed reservoir are strongly opposed, as are local farmers. Given the range of views within the OCP and the lack of information currently available the OCP requests that:

- i. Demand reduction and leakage is treated as the most important priority for investment, minimising the amount of additional supply water required
- ii. water recycling and water transfer are adopted first in the hierarchy of additional supplies
- iii. Nature Based Solutions (NBS) could play a much larger role in increasing the landscape's ability to retain and supply water for longer and more resiliently than present, through for example enabling more wetlands to be created and restored and more floodplains to function naturally. NBS needs substantially more investment to achieve multiple goals of reducing flood risk, supporting groundwater recharge, buffering against drought and increasing biodiversity, yet would be an order of magnitude cheaper to deliver than a major new reservoir
- iv. the adverse impacts of a new reservoir supplying not just the Thames region but other water supply areas would disproportionately affect the Ock's people, agriculture and biodiversity. This is more than just the provision of very substantial financial and biodiversity compensation but also an issue of fairness and equity
- v. The OCP understands there are records of breeding curlews within and around the area proposed for the reservoir within the last 10 years. This protected species is struggling in the Thames region and every successfully fledged chick is important. The OCP is very concerned about the loss of potential Curlew breeding territory associated with a reservoir. Detailed surveying for Curlew needs to be undertaken to identify their locations and breeding success and suitable mitigation provided. Freshwater Habitats Trust (FHT) are co-ordinating the Curlew Recovery Project in the Ock which aims to find and protect Curlew nests from ground predators using electric fencing and would wish to be engaged in any future work to understand how the area is used by Curlew
- vi. Thames Water engage very early with the OCP on all these issues if they decide to progress this option for water supply.

Q5. New water sources

Do you have any comments on the new water source options included in our draft plan

Any new water sources derived from abstraction should be from downstream and not from the headwaters and groundwater aquifers. This would help ensure sufficient water flows in the shallow headwaters which are potentially more vulnerable to low flows than the downstream sections of larger main rivers

Q.6 Best value for our customers

Do you think our draft plan represents the best value plan for you, your community and the environment?

No comment

Q.7 Other comments on our draft plan

Do you have any other comments on our draft plan?

OCP re-iterates the need to take a stronger line on reducing leakage to the absolute minimum and working harder with the business, industry and agricultural sector to lower demand. We also wish to see a far greater take-up of NBS to support water resource supply, reduce flood risk, tackle diffuse pollution and reverse the ecological collapse of wetland ecosystems in the Ock. This can only be achieved by increasing funding for NBS by an order of magnitude.