



The countryside
Oxfordshire

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Secretary of State (Defra),
Water Resources Management Plan Consultation (Southern Water) Water Resources,
Department for Environment, Food and Rural Affairs,
Seacole 3rd Floor,
2 Marsham Street,
London,
SW1P 4DF

Dear Sir

CPRE Oxfordshire – Response to Southern Water WRMP

Below are comments on the Southern Water WRMP from CPRE Oxfordshire. We focus on the proposal for the proposed Abingdon Reservoir (SESRO) to supply Southern via a pipeline. SESRO will have a massive impact on the Oxfordshire countryside, and we feel strongly that other options have not been adequately explored. We do rely heavily on the professional analysis by the Group Against Reservoir Development (GARD) and refer the reader to their more detailed analysis.

The Southern Water WRMP includes a proposal to transfer up to 120 Ml/day of water from the planned Abingdon reservoir (SESRO) to Hampshire via a new pipeline termed the Thames to Southern Transfer (T2ST). Southern Water would contribute 30% of the costs of SESRO.

The primary purpose of the Thames to Southern transfer is to reduce abstractions for water supply which impact on the flows of the Rivers Test and Itchen, where drought orders and permits can be currently used to allow abstraction to continue in severe droughts. In contrast to Thames and Affinity Water's proposed use of SESRO, it is not needed to deal with public supply shortages, due to projected population growth or climate change in Hampshire areas

The cost of the Thames to Southern transfer and Southern Water's share of SESRO will be in excess of £1.5 billion. The water companies themselves have assessed the economic benefit of the transfer as only £29 million. In our opinion, the T2ST scheme should be abandoned due to its minimal benefit, its high cost, and the perverse plan to export a large amount of water out of the Thames valley, where it is most needed for public water supplies for London and elsewhere. Taking this much water out of the Thames catchment would clearly have an impact on the ecological health and water supplies in the lower Thames.

The T2ST scheme is not needed to deal with public supply shortages due to population growth, climate change or chalk stream abstraction reductions, all of which can be met by the new Havant Thicket reservoir and Portsmouth effluent recycling schemes. (Southern Water should also redouble efforts to reduce leaks and water usage across their region.) The T2ST would then only be needed to prevent use of drought orders on River Itchen and Test supplies, perhaps once in 50 years (not once in 5 years as claimed by Southern Water). Indeed, records which show the drought orders and permits would last have been needed in the 1976 drought; they would not have been needed in the droughts of 1989, 1991, 1995-97, 2005-06, 2011, 2019 and 2022.

Southern Water's planned Havant Thicket/wastewater recycling scheme, delivering 60-90 Ml/d, is sufficient to meet all the future water supply needs in the Southampton and Portsmouth area. Provided its operating rules prioritise environmental benefits not cost saving, it will also allow early and substantial abstraction reductions in the Rivers Itchen, Test and other chalk streams; action, which is urgent, should not wait until the SESRO becomes available, optimistically, in the late 2030s.

The T2ST scheme and Southern Water's 30% share in SESRO would have a capital cost of at least £1.6 billion. Its assessed benefits for the Rivers Itchen and Test are only £29 million. The T2ST pipeline would have adverse impacts on the North Wessex Downs AONB, several protected sites and several ancient woodlands, which offset the minimal benefits for the Rivers Itchen and Test (where other, more cost effective, actions, such as water quality improvements, would have a far greater impact).

The plan for a Thames to Southern transfer scheme should be abandoned because of its small benefits, excessive cost, environmental impact and the perverse proposal to export a large amount of water out of the Thames valley, where it is most needed for public water supplies, and the protection of much more heavily over-abstracted chalk streams than the Rivers Itchen and Test. The infrequent and short-term impacts of using drought orders could and should be mitigated by a programme of extensive habitat and water quality improvements, and, for example, by moving some lower Itchen abstractions 10 km downstream, using some of the £1.6 billion saved by scrapping the T2ST.

While CPRE Oxfordshire fully support the restoration and protection of chalk streams right across the SE it must be recognised that the construction and management of the SESRO will cause immense environmental and social damage. There are also huge risks, physical, financial and environmental, associated with the reservoir and we believe there are cheaper and more environmentally friendly pathways to improve the chalk streams (and other water courses) across southern Britain.

Yours sincerely

Prof. Richard Harding,

Water Advisor, CPRE Oxfordshire