

Representation of  
STEVENTON PARISH COUNCIL'S

submission to the Secretary of State (Defra)  
in response to Thames Water's revised draft Water Resources Management  
Plan(rev.dWRMP)

1 Executive Summary

Steventon Parish Councillors are the elected representatives of the residents of Steventon who will be amongst those most seriously affected by Thames Water's proposals for a new reservoir development in Oxfordshire. This submission is concerned with the proposal for the construction and development of an exceptionally large reservoir, much of which would fall within the parish of Steventon.

This document represents the Parish Council's efforts to fulfil their obligation to use their best judgment to represent the general views of the residents of the parish.

We are still of the opinion that Thames Water's case, as currently presented, is not proven and that there are still considerable flaws in their assumptions, conclusions and justifications which need to be addressed before their proposals for a new reservoir in this area are robust enough to deserve any further consideration.

We are confident that most people living in our parish share the following major concerns:-

- / The lack of compelling evidence for the need for this enormous project.
- / The lack of rigor in Thames Water's assessment of viable alternatives.
- / The scale and duration of the proposed works.
- / The increased potential for both low level and catastrophic flooding in the village; which is already very prone to seasonal flooding.
- / That the continuing high level of leakage from the infrastructure in London is still not being adequately addressed by Thames Water and distorts their future demand projections.

Steventon has been affected by the uncertainties caused by these proposals, and their predecessors, since 1990 and we welcome the Secretary of State's decision to hold a Public Inquiry to enable a full and proper assessment of the need for the proposed reservoir at Steventon.

2 General Observations

2.1 We still contend that there are significant areas where the robustness of the whole revised Plan is still open to question and as a result, the case for the proposed reservoir remains far from compelling and unequivocal. Our main concerns are with Thames Water's forecasts and assumptions, their treatment of the current and ongoing research findings in areas which will influence the supply demand balance, and their lack of rigor in assessing some of the alternatives available for increasing supply, other than reservoir building. Thames Water have been found to have supplied incorrect information to OFWAT in the past

and it is therefore of great concern to us that the information on which they base their revised Plan is most carefully scrutinized and assessed.

2.2 We still strongly believe that Thames Water has significantly overstated the supply demand balance and need to undertake a more robust analysis of alternative supply options, including wastewater reuse.

2.3 We remain gravely concerned by the dramatic variations in Thames Water's forecasts of the supply demand deficit over the period it has been promoting a new reservoir development as the only viable option available.

2.4 We understand that if the proposed reservoir were to be built it would become part of Thames Water's Regulated Capital Value and so their customers would have to continue to pay for it whether or not it were used. As customers of Thames Water we continue to consider this a further pressing reason why the case for the reservoir should be robust and indisputable before any such plans are allowed to proceed.

### 3 Major Concerns

These are the main areas of concern that we still believe must be considered in depth by the Inquiry. A more detailed analysis of each can be found in the six technical appendices that are attached to this document.

3.1 Per Capita Consumption – There appear to be a number of particularly unreliable assumptions and extrapolations used to predict increases in some micro components. These are a cause for concern as they result in an increase in the predicted demand for water.

3.2 Leakage – Thames Water's plan continues to take a very pessimistic view of size of achievable future leakage savings that make the probable costs/benefits of making them look unattractive. At the same time it seems to be specifying non-challenging targets for leakage in new mains in order to cut costs. We still do not believe that this is a realistic reflection of the possible savings that could be made nor of the costs of making them.

3.3 Demand Management by efficiency savings – Thames Water seems to be neglecting or minimizing this, even though the indications from the revised Plan are that it could make a huge difference. The measures Thames Water proposes to improve water efficiency are vague and undemanding and there is a clear need to make these more robust, for example by specifically targeting high consumption customers with awareness raising campaigns and financial incentives.

3.4 Alternative sources of water – these include Bulk Transfer, SWA-SWOX transfer and Wastewater reuse. We are aware that these have all been extensively researched and evaluated by other groups making submissions. We would, therefore, simply note that we still do not consider that Thames Water has adequately assessed these, and other alternative supply options; and what appraisals they have undertaken have not been sufficiently rigorous.

We also note the differences in predicted costs made by Thames Water over the period of its promotion of various reservoir schemes in this area and these have added to the grave doubts we have about how these were derived.

## **Conclusion**

Steventon Parish Council are still of the opinion that the forecast deficit in the supply demand balance has been overstated by Thames Water, and as such the case for the proposed reservoir in their plan has not been proven.

We continue to question the robustness of many of Thames Water's forecasts and assumptions (especially relating to PCC) on which their projected need for the reservoir is based, and are disappointed at their attitude to ongoing research and the concerns of local people.

While we recognise that the area that would be affected by these proposals does not have any designation as a protected area for wildlife or landscape conservation it is a locally important area for wildlife and currently supports increasing numbers and breeding populations of Red Kite, Buzzard, Curlew, Lapwing, Barn Owl, Water Vole, Great Crested Newt, Slow Worms and native Crayfish. All of these are increasingly rare in the UK and any disturbance to or disruption of their breeding sites could well have a significant effect on national numbers.

We remain unconvinced that the benefits Thames Water promise locally and nationally will in anyway counteract or outweigh the detrimental impact both the development itself and/or the finished reservoir would have on the environment.

The fears of flooding both during and after any possible construction works are very real in the village where some residents have only recently been able to return to their homes after the 2007 floods. These fears have been consistently expressed at public participation sessions of Parish Council meetings and the Thames Water consultation exercises but have never been adequately acknowledged or addressed by Thames Water.

Other, less quantifiable but never the less real concerns that have been robustly expressed to us include fears of breaches of the embankment walls and bunds of the proposed reservoir due to seismic effects or deliberate attack; the changes that such a huge water body would produce on the local climate especially increased occurrences of fog on the A34. The negative effect on the quality of life of everyone in the village that would be caused by the severe noise levels, dust and vibration during any construction, and the loss of visual amenity, especially the notable sunsets over the area are other causes for concern that have not been adequately addressed by the revised plan.

The case for such a huge development, anywhere, needs to be clear, credible and indisputable before it is allowed to proceed. Although we acknowledge the considerable improvements that Thames Water have made to the revised plan we still do not believe that it adequately addresses or meets any of these criteria.