Thames Water –

Draft Water Resources Management Plan 2024

Consultation Response by Planning Oxfordshire's Environment and Transport Sustainably (POETS)

March 2023

POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

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Water efficiency

1. POETS support Thames Water (TW)'s proposals to address much more seriously leakage from its own pipe network: it seems that 26% of treated water is lost through such leaks. An example of the problems presented for households, businesses, farmers, and those in university accommodation was the loss of water supply following the fracture of a major pipeline on the Oxford Eastern By-pass in 2022.

2. However, we also believe that much more could be done by Thames Water to persuade and influence its customers to reduce their water consumption. The document makes clear that, while the TW area is one of the most water-stressed in the UK, household consumption increased hugely during the long, hot and dry summer of 2022: at the same time, rivers and streams were under great stress. This represents a failure of communication to existing and future water users that household practices – such as watering gardens, and washing vehicles - need to change.

3. The Draft Plan is too timid about water efficient behaviours. Section 3 of the main report shows that metering should be extended (at present only 50% of household customers have a water meter, not all of them smart); more publicity campaigns on household behaviour should be undertaken (eg discouraging car-washing and watering lawns, or saving non-potable water); and much more support given for schemes for recycling water in both newly-constructed and existing properties.

Per capita consumption (pcc)

4. Figures included in Section 3 of the full report show that per capita consumption in the SWOX area is higher - at 144.9 litres per person per day (lpd) - than the regional average at 143.1 lpd, even though SWOX has greater use of metering, and its pcc is considerably higher than the neighbouring SWA (Slough, Wycombe, Aylesbury) area at 139.9 lpd.

5. Moreover, the Draft Plan is feeble in its ambition for overall per capita consumption by the end of the Plan period, proposing only a reduction to 125 lpd by 2050 (or 123 lpd, taking into account new product-labelling, and upgraded building regulations for new homes and retrofits). This is considerably weaker than the Government's committed target of 110 lpd by 2050. For one of the most water-stressed areas of the country, this is feeble and *should be* unacceptable to government. A recent study, for example, proposed a target of 85 lpd for all new build housing in the Sussex North Water Resource Zone.

South East Strategic Reservoir Option (SESRO)

6. The failure to set high ambitions for reducing per capita consumption rather undermines TW's case for a new strategic resource. We are concerned that, if the SESRO were to go ahead, TW might make even less effort to reach the government's own per capita consumption target. Moreover, as we argued in our response to the draft WRSE Plan, the carbon implications of any SESRO have to be very carefully and honestly assessed. It is not evident that the construction of such a huge, carbon-intensive structure would satisfy any assessment of the net carbon implications of TW's overall plan.

7. It is clear from the draft Plan that SESRO would require water transfers from the Severn and its wider catchment, and that it would provide a resource not just for the Thames Water area, but for water transfers to water companies elsewhere in the South East. We would look to be reassured that this is being fully assessed at the cross-regional level, and that Water Resources West and Welsh Water support this transfer.

Conclusions

8. In summary, POETS believes that

   a) Thames Water owes a duty of care to its customers to ensure that they are prepared for the certainty of very different water-resource circumstances over the rest of this century.

   b) The DWRMP24 is too timid and conventional in its ambitions for one of the most water-stressed areas in the country. A target per capita consumption of 110 litres per day by 2050 should be the maximum acceptable.

   c) The case for any SESRO is undermined by Thames Water's low ambitions for significantly reducing per capita consumption.