WRSE (Water Resources South East) 2022 Future Proofing our Water Supplies:

A Consultation on Our Emerging Regional Plan for South East England

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

March 2022

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.

For more information go to *www.poetsplanningoxon.uk*

POETS commends and welcomes

a) the efforts of the water companies in the region to work together and to plan at a regional scale;

b) the emphasis in the draft Plan on environmental restoration and protection, especially with respect to chalk streams, and the commitment to biodiversity net gain in development of any new water resources;

c) the seriousness with which climate change (both adaptation and mitigation) is considered and partially taken into account;

d) the intention to develop an Adaptive Plan beyond the initial time period of 2025-2040, and into 2040-2060.

However, POETS has the following significant concerns about the draft Plan:

1. The latest IPCC report on Climate Change Impacts[1] reinforces the urgency with which we must adapt to current and expected climate change. We believe this means further challenge to the proposed Upper Thames Strategic Resource Reservoir/SESRO[2]. POETS understands the potential conflict between the necessary early planning for such major infrastructure, and the need for adaptive planning. We consider however that
   i) as the carbon implications of the reservoir construction and operation are huge, WRSE and its constituent water companies must put more effort into fully assessing and costing alternatives in the light of the climate change emergency
   ii) a Strategic Environmental Assessment for the WRSE Plan must expressly look at meaningful alternatives in this light.
2. Much more effort in the early (2025-2040) phase of the plan should therefore go into leakage control, water efficiency, demand management and pressing for improved Building Regulations.
3. POETS considers that more attention should be paid to the local democratic role of the locally-elected councils. POETS commends the LPAs within Oxfordshire who have all taken seriously the extent to which the county is an area of water stress, and have taken the opportunity provided in the Building Regulations[3] to adopt planning policies which specify high standards of water-efficiency. All Local Plans currently require a water-efficiency standard for new development of 110lpd[4]. POETS therefore recommends that WRSE and its constituent water companies work more closely with Local Authorities and Parish Councils in the area of household demand management, where local action to promote water-saving developments and household measures might have great resonance and efficacy.

[1] IPCC 2022 *Climate Change 2022: Impacts, Adaptation and Vulnerability: Summary for policy-makers* https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

[2] A site for this major resource is safeguarded in the *Vale of White Horse Local Plan 2031*

[3] HMG/MHCLG July 2020 *Manual to Building Regulations* p. 53 F20B

[4] Oxford City Adopted Local Plan to 2036; Cherwell Adopted Local Plan to 2031; South Oxfordshire Adopted Plan 2035; Vale of White Horse Adopted Plan to 2031; West Oxfordshire Adopted Plan to 2031.

4. POETS would also like to see greater transparency over the assumptions made on household and population growth over the two planning periods. We are concerned that the levels of housing growth under consideration both within Oxfordshire and across the wider south east are inconsistent with the fact that the area is one of water stress. The Emerging Plan at p.10 estimates three ranges of population up to 2060 ("minimum": 230,000 more people; "housing plan": 4 million; and "maximum": 5.3m). WRSE claims (p.35) that it has worked *"with local authorities to help us forecast how many people we will need to supply water to in the future"*. We consider that the Emerging Plan should give a fuller but summarised explanation of the process, based on the very detailed work undertaken and reported in Annex 1.
5. POETS welcomes the effort by WRSE in early 2022 for webinar participation in the consultation process over the Plan, and WRSE's publication of answers to the many questions raised. However, we are not clear about the extent to which WRSE has pro-actively publicised its plan to the wider public. WRSE should give an account of their pro-active communication with organisations about the consultation, as well as any wider publicity they have undertaken.