

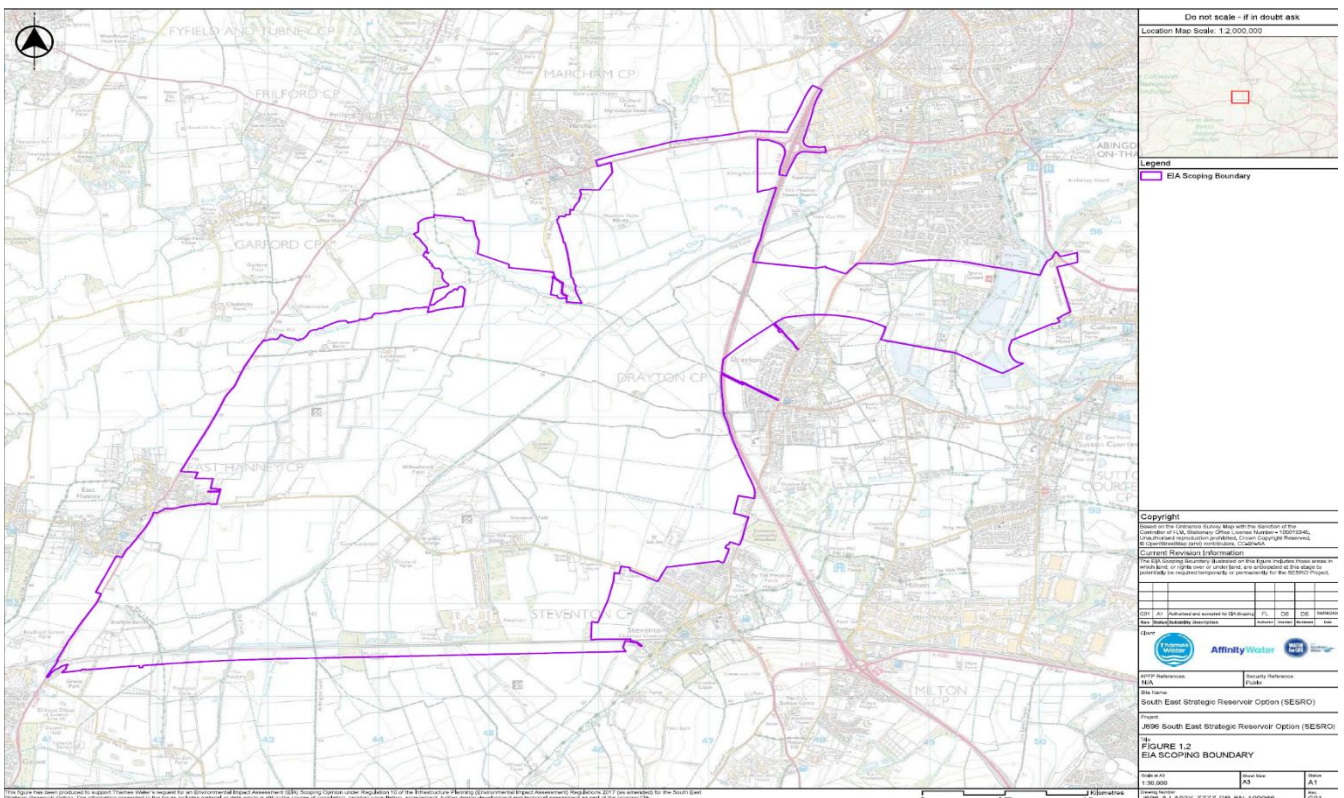
Abingdon Town Council Planning Inspectorate Thames Water SESRO EIA Scoping response

Thank you for consulting Abingdon Town Council on Thames Water’s proposed EIA Scoping proposal.

As with our response to Thames Water’s voluntary public consultation this July and August, the Council has some significant concerns regarding omissions, assertions and methodology in this proposal as follows:

Scoping Comments

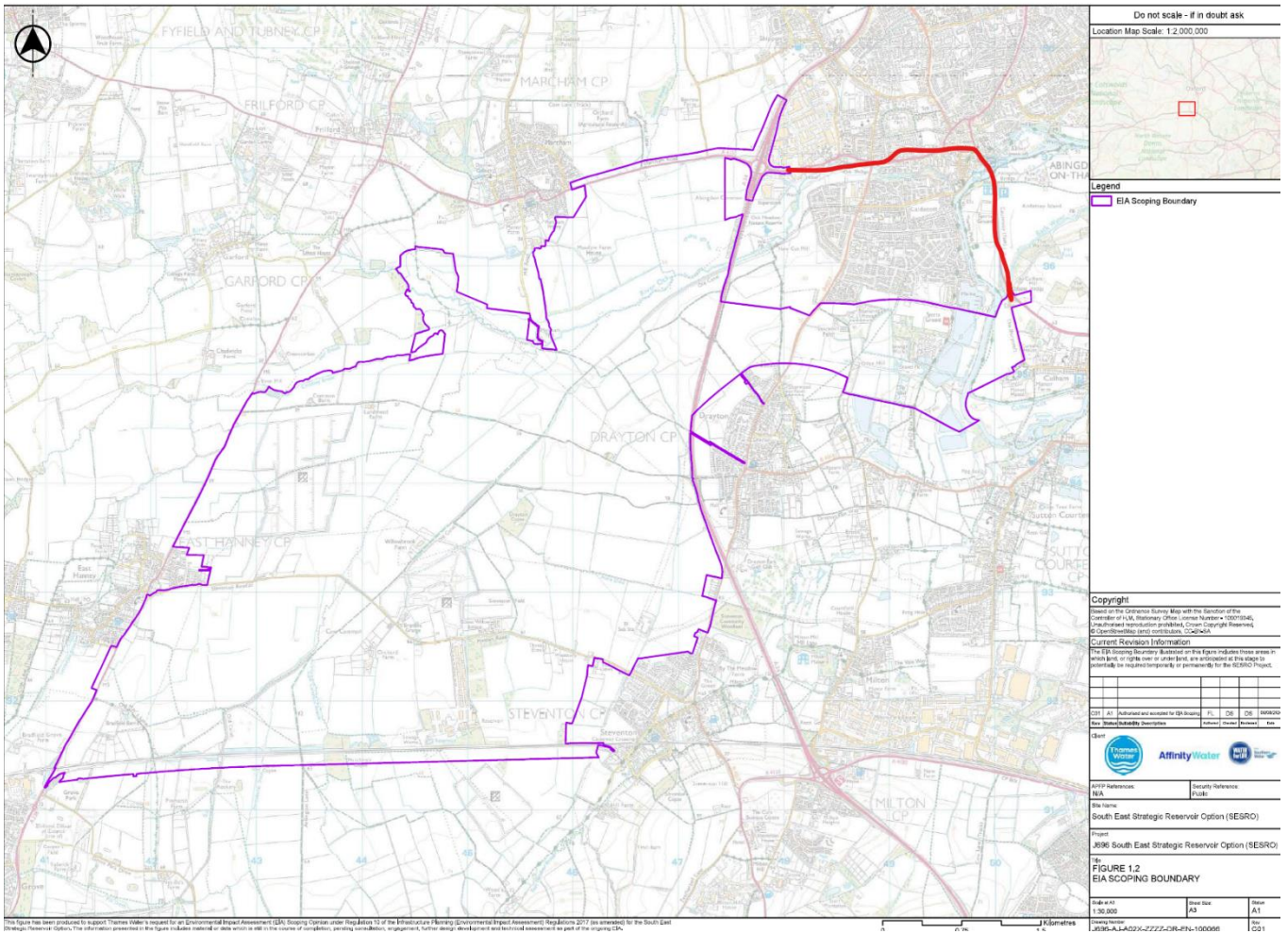
1. EIA Assessment area boundaries – Fig 1.2



Abingdon Town Council has an issue with these boundaries as the areas of south Abingdon, in particular the River Ock floodplain from the A34 culvert, continuing in close proximity or through residential areas that have in the past been affected by flooding, to the confluence of the Ock and the Thames.

In the Council’s opinion this area should be scoped into the assessments as the S19 Flood Incident Report referred to in point 4 occurred within that area and we have concerns that SESRO will cause additional water course and groundwater flooding in this well-populated area.

Our scoping would follow Marcham Road, Ock Street and the High Street to the North and Bridge Street to the East as shown:



2. Climate Projections clarity - statement made in Sections 6.6.3 & 7

‘Climate projections generally indicate wetter, milder winters, a shorter sharper groundwater recharge season, higher temperatures, potential increased evaporation and drier soils. During extended drought periods it is expected that the wetter winters would not offset the impact of drier summers. As a result, summer flows in the River Thames may be lower in the future meaning augmentation from the SESRO Project has the potential to provide beneficial effects during certain low flow periods.’

Abingdon Town Council is unclear, given that SESRO is predicted to need abstraction from the Thames for a minimum 2 years to fill, how resilience as a sustainable water supply solution can be maintained given this statement?

This needs clarification and scoping in and also leads to our next point

3. 2018 National Infrastructure Commission (NIC) report1 – reservoir alternatives

Thames Water discuss only one option, SESRO, but there are other ways as in the recommendations of the 2018 National Infrastructure Commission (NIC) report1:

- Provision of at least 1300 MI/day of water through a national water network and additional supply infrastructure (smaller scale dispersed reservoirs, re-use, desalination schemes) by the 2030s
- Halving of leakage between 2018 and 2050
- Compulsory water metering

They considered water transfers, reservoirs, desalination, and re-use, the latter three always had potentially significant drawbacks. However, the NIC says of Water Transfers they are the exception:

“A range of studies have all found a positive cost-benefit case for greater transfers and water trading (see Annex 3 NIC Report1 2018). However, transfers currently only make up a small proportion of total supply (about 4%). This is likely to be because the incentives in the current system make developing a strategic transfer network difficult, meaning that the decision needs to be made at a different level.”

Scale of water made available by inter-regional water transfers is greater than combination of any projected reservoir projects.

Severn-Thames Transfer (STT) alone could make 300-500 MI/day of water available to Southeast from plentiful existing reservoirs in North West and Wales and be available in under a decade.

SESRO output is believed to be 270MI/day

The Severn Thames Transfer is only mentioned as a potential future add on, should it become necessary, because SESRO is not capable of maintaining supply. In the current scoping ‘alternatives’ appear to only refer to possible locations for SESRO, as opposed to ‘is this the best, most resilient solution for future water supply’.

Abingdon Town Council believes the option of Severn Thames Transfer with local reservoirs, needs a thorough and robust all-criteria comparison against SESRO for cost, delivery, environmental and most important, sustainable supply and should be scoped as substantive validation for the reservoir option. As to date, Abingdon Town Council has been unable to easily ascertain if this has been done.

4. River Ock flood area – Chapter 6.6.31 statement and see Town Council amended boundaries plan

‘SESRO, once constructed, would capture rainfall that would otherwise contribute to catchment flows, notably in the diverted watercourses. This means that the overall contributing catchment to the

diverted watercourses is slightly reduced. In addition, diverted watercourses would change some of the flow routing in some reaches of the Childrey Brook and lower River Ock. Preliminary modelling has shown that the reduction in catchment area results in an overall effect on flow in the lower River Ock that is very small and, therefore, the effect on the hydrology of the River Thames is negligible. However, this remains scoped in to review against currently ongoing modelling updates'

The Town Council want to see a very robust scoping policy for the flood risks both for the construction and operational phases as there have been significant flood events on a regular basis in the area including early in 2024 running back from where it flows into the Thames through the town up to the Tesco Super store, which has had several lost days of trading in 2024 due to its car park being flooded, as it has also done in previous years.

- Residential properties have been affected as evidenced in Oxfordshire County Councils S19 Flood Investigation Report at:
<https://www.oxfordshirefloodtoolkit.com/wp-content/uploads/2024/07/S19-Report-Nash-Drive-v1.0-FINAL.pdf>
- At our Council meeting of the 31st July 2024 Thames Water assured us that they would ensure the position would be the same as it is now.
- "As it is now" would result in a repeat of the incident detailed in the S19 Report.
- This is clearly not acceptable for residents with affected homes, Tesco and the residents of Abingdon and the surrounding areas who rely on that store.
- Residential developments have to pass stringent requirements and so should this scheme under robust methodology.
- The Council strongly believes this situation will be worse without the area of the reservoir available as arable land further upstream, allowing mitigation schemes on the Ock through natural measures.
- Increasing backup at the confluence with the Thames could seriously impact residents and businesses in areas already on EA flood maps including upstream of the Ock /Thames, past Abingdon Bridge in an area including historic buildings.
- These areas of Abingdon require scoping into the EIA.
- Currently, Thames Water say they have limited groundwater data for River Ock area, more modelling and data is needed, but our fear is SESRO occupying this location will increase flood risks for the town and surrounding areas.
- 6.6.18 Preliminary groundwater modelling (currently in development) suggests the introduction of SESRO could lead to an increase in groundwater levels. Groundwater flood risk is, therefore, also scoped in which is reassuring but needs to be extremely robust
- There are limited details of the proposed flood hold back area for the Ock. That also needs to be robustly modelled, as a further concern for the town is that the Environment Agency's ability to deliver a suitable additional scheme under a Capital Flood Risk Project, as highlighted in the

S19 Report for the Ock above, might not be able to be implemented or prove ineffective in this scenario.

4. Movement of personnel, equipment and material impacts

In the Town Council's response to Thames Water's public consultation this August under this heading our comment was:

'The scheme seems to rely on the hope that the railway delivery and handling yard is permitted on a very crowded main line, which has not yet been agreed, and will take 2 years at least to build with the potential to impact scheduling on the London to Bristol main line.

Locally, it is well known the A34 is at or beyond capacity and has frequent accidents, especially in the Milton and Marcham interchange areas and cannot be considered a robust and sustainable option.

Abingdon is already regularly a gridlocked town without these now too frequent incidents, but when they occur, hours of ongoing extreme disruption and significantly increased pollution are generated, which the town and residents should not be expected to accept.'

Reviewing Section 11 for Traffic and Movement the Council is disappointed as:

- Scoping to cover for the option of permission for a construction rail siding being denied is not included.
- The Council's understanding of the railway siding location is that it is on a section of track where commuter services run at 125mph in an already very busy network timetable so is the scheme achievable with road only access needs to be modelled with all the associated environmental impacts.
- Scoping is not possible for the construction and operational phases as the statement is given that plans for these have not been drafted or are insufficient in detail, so the Council feels this scoping be held back until there is more detail available.
- Scoping should also include the possibility that construction takes longer than predicted. Recent significant Infrastructure projects like Crossrail and currently HS2 were, and are not, running to time, so contingency needs to be built in, possibly to the mid 2040's
- There are a large number of assumptions regarding workers being predominantly local and their travel possibilities. Scoping needs to allow for options such as workers' buses or park and ride areas to minimise any traffic increases.
- Construction traffic management scoping should add enforcement items like ANPR cameras on prohibited routes to prevent inappropriate rat runs with all the associated environmental harm and damage to residents' health property and environment. The EIA is aware of Abingdon's historic buildings hence the Council's wish to see adequate protection options studied.
- The preferred main site access road option on the A415 is very close to the Marcham A34 / A415 junction, which frequently operates at very high capacity and already causes delays at

peak times. Extremely rigorous modelling will be needed to prove sufficient capacity exists to accept the construction and operation phases traffic. The scope should be 'worst case scenario' needs based on no railway siding option being available until proven otherwise.

- 11.5.7 acknowledges there are already significant traffic volumes in the town, reinforcing Abingdon Town Council's view that no construction traffic should be added.
- Abingdon Town Council also has the microclimate impact concerns that a reservoir the size of Gatwick Airport will bring to the local area, and so impact on both the A34 and other local roads and cycleways.

5. Interaction with new local Plan Developments scheduled for SESRO timescale.

- This was also mentioned in our Thames Water Consultation response due to the well-progressed work on the new Vale of White Horse and South Oxfordshire Districts Joint Local Plan 2041 for redevelopment of Dalton Barracks (2,700 houses) and Culham Science Village (Science Park and 3,500 houses) to meet local needs
- Scoping must be included for SESRO traffic assessments to allow for these projects while avoiding total grid lock to Abingdon as all three projects are proceeding on similar timescales.
- Scoping needs to prevent any construction traffic using Abingdon's roads. The town's one historic bridge recently had to have significant remedial work and single lane working applied. The bridge, our other historic buildings, and 33,000 residents and their homes should not have to cope with prolonged exposure to construction traffic and years of frustration, so road management plans must be scoped to meet that requirement.

6. Project Scale, Management, Delivery and Accidents / Disasters

- SESRO is to Abingdon Town Council's understanding one of the largest, if not the largest reservoir to be constructed using the bunded method in this country. At over 10 times the capacity of the nearby Farmoor Reservoir and occupying an area the size of Gatwick Airport the use of the bunded method of construction at this scale is untested.
- The Council is concerned that the trial bund being planned is a very minor smaller scale test, not representative of the scale of the actual build so would suggest that the EIA should include an assessment of whether this significant scaling-up is valid.
- Thames Water frequently quote the UK 1975 legislation covering reservoirs, dams and embankments but scoping in additional contingency in view of the size and scale of the project would be prudent to minimise potential failures / breaches. (Section 19)
- Severe weather has been factored out, yet Thames Water have quoted climate change in Sections 6,7 & 16 of the scoping document, as mentioned earlier in our response. The

Meteorological Office have reported tornados and extreme rainfall events in the UK this year, so the Council feels severe weather should remain in the scoping. (Section 19)

- Landslides and slips have also been scoped out but during such an extended and large-scale construction running and with wetter winters and drier summers under climate changes, the Council feels this should remain scoped in. (Section 19). In Section 16 those wetter and flood events for erosion/scour damage are listed, so possible embankment failure impacts being scoped again post construction seems prudent.
- Failure of Steventon electricity substation has been scoped out as connections to it will be made by competent contractors. But what about a catastrophic substation failure and an urgent requirement for a drawdown of water back to the Thames being required? (Section 19)

7. Air Quality

- Odour emissions to be monitored up to 2km away from the site during construction. Potential impact above that distance is not considered likely. The site is Southwest of Abingdon and our prevailing winds are south westerlies blowing to the north east so the Council feels Abingdon should be included in the scoping.
- Vehicle emissions during construction using the A415 to join the A34 at Marcham Interchange would be passing allotments owned by the Town Council. These would be well used during the Spring to Autumn prime construction months each year, so the Council feels an assessment for that part of the A415 should be scoped in.
- The Council feels construction vehicle emissions should be scoped in as it will not be a small amount of plant required.
- Dust can travel substantial distances with wind and as mentioned Abingdon is North East of site in south westerly wind track so modelling must include the town.
- The Thames Intake / Outfall construction will generate dust and odours and is very close to major residential areas of South Abingdon so requires a robust assessment as work will be in months people want to be outside.

8. Noise and Vibration

- In construction phase, the Council is concerned that Abingdon's location could be impacted by construction plant and delivery traffic increasing cumulative load already in place from the A34
- The Thames Intake / Outfall construction will generate noise and vibration and is very close to major residential areas of South Abingdon. The Council would ask that this is scoped in, especially the impact of a Tunnel Boring Machine running 24 hours a day, as during the Crossrail

construction there were instances of pauses to allow for securing property that had started to be adversely affected.

- Assessment is also needed on whether these vibrations in South Abingdon could cause damage to property and what is the maximum transmission distance from the route as we have a very high number of historic buildings in the town.
- Construction delivery vehicles have to have approved routes enforced both for SESRO main and Intake / Outfall sites to ensure validity of assessments.

9. Materials and Waste

- The Town Council is disappointed that on many parts of this section statements are being made that it is too early in the SESRO process to quantify supplies and landfill requirements to give details for scoping.
- The Council considers that moving to the next stage PEI to include these matters is not appropriate and scoping should be paused until the necessary work is complete to allow full and proper scoping consideration.

10 Carbon and Climate Change

- 16.5.9 & 16.5.10 suggests micro climate effects will be minimal so will be scoped out of the EIA. The rationale is that although a large body of water it is not significant enough. However, as a reservoir ten times the size of the current Farmoor Reservoir Abingdon Town Council believes this should be scoped (as stated in our comments regarding Traffic earlier).
- The Council would like to see a contingency added to the scoping for construction as projects taking longer to achieve. Extending this period to 2042/3 would seem prudent and representative for construction GHG

11 Biodiversity and environmental net gain

The Town Council's August Consultation response to Thames Water stated:

'The length of the build plan and the extreme disruption of the local environments and wildlife cover at least a 10 year plan and probably significantly longer, so how long will reaching that stage actually take?

The Council has very strong concerns that local wildlife, watercourses and fauna will need a similar time to recover and remain to be fully convinced that they will. This will impact residents, their children and grandchildren for potentially a couple of decades at least, if not irrevocably.'

The Council notes the scoping for Aquatic (Section 7) and Terrestrial (Section 8) Ecology, Landscapes and Visual Effects (Section 9).

Regrettably, especially concerning Landscape and Visual Effects, the conclusion is Thames Water are looking at a 15 year period following construction for blending in, so there is at least 25 years to attempt to reach that point from build commencement. Visually, even at year 15 residual landscape effects may remain which causes us concern. (9.6.10)

The Town Council feels scoping on this aspect needs to be extremely robust as it is not clear whether net gain will actually be achieved even within that timescale.

Scoping should also include over what timescale is the 10% net gain anticipated to be returned as this is not clear, which is not acceptable to residents.

12 Transfer main/ run off channel changes and the Berks/Wilts Canal

Previous schemes allowed for this to be an open channel to allow supporting Berks & Wilts Canal Trust efforts to progressively restore and reopen the canal to offer far more amenity use.

Now it is to be subsumed into the reservoir area and lost for the future with a major tunnelling effort disrupting a significant area of the country from the site to the Thames.

The Council supports scoping alternatives to the intake/outfall tunnel, especially as in both the Climate Change (16) and Emergencies (19) sections changes in climate and groundwater are being flagged as potentially impacting the ability to use the underground channel.

13 Communities Section 17

The scoping of impacts needs to be robust especially in areas like incoming work force and potential employment possibilities for local residents.

Although SESRO could potentially bring economic benefits to Abingdon, the Town Council has some very serious concerns over impact on public services and our local housing market.

For example, all NHS Services in Abingdon are running above capacity with no plans to address capacity, even though we currently have 1100 houses being built in the north of the town.

Far more detail needs to be scoped for this section. However, as this appears to be dependent on having far more overall construction plan detail, again the Council feels the EIA should be paused to allow for that to happen.

14 Health Section 18

The Council notes the scoped in items which need to be robustly examined. We feel the noise, air quality (including dust) and all the associated significant disturbances including pollutants, of such a major development have a significant potential to severely impact health outcomes, including mental health, for all residents and especially those with existing conditions or susceptibilities.

Consequently, those should be scoped in.

The 10-year minimum construction timescale makes this section extremely relevant with the added anxieties that will arise in the Council's opinion.

Summary

Thames Water have stated that the EIA process is designed to be flexible as some information is only available at later stages.

However, there appears to be a large amount of key information for significant component parts of the project that are not able to be specified.

Abingdon Town Council accepts that major developments by nature have some evolution but in our opinion there are far too many unknowns in the current iteration. There is a lot of proscribed legislated working process shown but it is tempered by what appears to be high levels of assumption, details not yet available or not considered so scoped out.

The Council is extremely concerned that for the EIA Scoping exercise to be a meaningful, valid stage of the process it should be paused until more data is available for the following items:

- River Ock catchment
- Flood risk
- Potential design
- Construction and quantities
- Whether the proposed railway siding is actually likely to proceed.

25th September update – over the last 24 hours the River Ock and the South Abingdon residential and Tesco areas flooded in January 2024 including all in the S19 Flood Investigation are once again flooded with water levels still increasing.

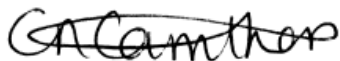
Facebook Community comment links are provided here for review to show why this process needs pausing while full survey and monitoring data is obtained, and proper solutions are sought to cope with predicted ground and surface water changes in the future.

<https://www.facebook.com/share/v/9YAt6kNdzcnvCLqF/> - 24/09/24 – Abingdon Facebook drone footage – flooded Tesco and Premier Inn

<https://www.facebook.com/share/7VrAtA6DuJeLJuH3/> - 24/09/24 – Councillors posting flood warning updates

<https://www.facebook.com/share/p/do4s61MG4DXppUw8/> - 25/09/24 – Councillor Flood Risk update

Thank you once again for consulting Abingdon Town Council on behalf of our residents.



Cherie Carruthers
Town Clerk/CEO