Planning

Head of Service: Adrian Duffield

Vale of White Horse District Council

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on behalf of the Secretary of State
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By email only

25 September 2024

Your Ref: WA010005
Ref: P24/V1874/3PC

Dear Emily Park,

Proposal: Scoping consultation
Location: South East Strategic Reservoir, Land between East Hanney, Steventon, Marcham & Drayton
Consultation End Date 25 September 2024

Thank you for consulting the Vale of White Horse District Council (The Vale) on 28 August 2024 regarding a Scoping Opinion for the Thames Water South East Strategic Reservoir Option (SESRO).

The following comments are based on the proposal submitted. Should the final scheme be revised compared to that currently submitted, it is considered a further scoping opinion may be required.

It is recommended that the Environmental Statement (ES) required for the proposed development should cover the format proposed by the applicant. The Vale has considered the scope of each chapter for the ES and provides advice below as to where that scope should be widened and other matters to be scoped into the ES.

Environmental Impact Assessment (EIA) should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The ES should demonstrate the ways in which it complies with that requirement.

To assist the applicant, the relevant documents of the Development Plan for the Vale of White Horse District should be considered and comprise the following:

Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016)

Vale of White Horse Local Plan 2031 Part 2 (adopted October 2019)
Drayton Neighbourhood plan (adopted July 2015)
East Hanney Neighbourhood Plan (adopted May 2024)
Steventon Neighbourhood Plan (residents voted for adoption 5 September 2024)
Sutton Courtenay Neighbourhood Plan (adopted May 2024)
Wootton and St Helen Without Neighbourhood Plan (adopted December 2019)

The following from South Oxfordshire is also relevant:

South Oxfordshire Local Plan 2035 (adopted December 2020)
Culham Neighbourhood Plan (adopted June 2023)

The Vale considers the following matters should be addressed in the ES.

Baseline Data
The Scoping Report partly assesses the baseline scenario based on surveys that are yet to be completed. Whilst the Vale understand it takes time to collate baseline evidence, this does make assumptions within the Scoping Report difficult to assess and it is considered that scoping needs to remain under review until all the baseline evidence is collated.

Need and Alternatives
3.2 Alternatives to the Proposed Project
The Scoping Report does not provide details of reasonable alternatives.

The ES should include detailed consideration of reasonable alternatives to the development proposal, including National Infrastructure Commission (NIC) recommendations from 2018[1] for a water transfer network (national water grid) to move existing supply from where it is plentiful to where it is needed.

Furthermore, the Revised Draft Water Resources Management Plan 2024 identified that planning for a 100 Mm3 reservoir would perform better from an environmental standpoint, while the 150 Mm3 reservoir resulted in a plan which was more resilient to risks. Thus, the smaller variant should be considered in more detail as an alternative option.

Evidence is also required on why alternative less costly and less damaging options which could meet projected future water supply demand have been rejected or shelved. These should be considered in the ES with detail provided of the options and choices made.

3.3 Alternatives considered within the Proposed Project
The Vale consider options are not evidence led and it is not known if options are viable and practical. To appraise the impacts and benefits of any scheme, detailed environmental surveys are required to first identify the sites constraints and opportunities before entering the design stages of a project. With a scheme of this scale the need for accurate and detailed surveys are critical. As Thames Water have

[1] https://nic.org.uk/app/uploads/NIC-Preparing-for-a-Drier-Future-26-April-2018.pdf

not been able to gain access to a large proportion of the site, such essential surveys have yet to be completed to scope alternative options within the project as options relating to specific elements of the project contain very little technical information to make an informed view.

Furthermore, it is noted that the scoping boundary is defined as land 'to potentially be required either temporarily or permanently for the construction and operation of the Project' (2.2.2), but the boundary does not include land to the south of the railway where the recent public consultation included an option of constructing a road. The boundary should also include land options for a Wantage and Grove railway station as a railway station may be required as part of this project.

The ES should also address the effects of reconstructing the Wilts and Berks canal as it may be necessary to construct it as part of this reservoir project.

Paragraph 2.7.7 renewable energy doesn't mention existing renewable energy generation that will be lost from this project. The reprovision of renewable generation on site and associated impacts including landscape and visual and biodiversity should be covered.

Consultation and Engagement

4.2 Consultation Process for the SESRO Project

The Vale considers engagement through Technical Liaison Groups (TLG) has not been effective in assessing and evaluating environment topic areas due to the absence of technical information to make an informed view.

4.3 Engagement regarding EIA Scoping

The Vale disagrees with the statement at 4.3.1. Most TLG meetings to date have not focused on Scoping and baseline surveys in any depth, despite a request from the Vale for such information, particularly in relation to flood risk, ecological and arboriculture matters.

EIA Methodology

The Vale has no comment to make on this chapter of the Scoping Report.

Proposed Scope of Assessment: Environmental Statement Chapters

6 Water Resources

Detailed flood risk assessments and drainage strategies in accordance with the latest national and local standards will be needed to inform the ES.

There is only one current gauge on the River Ock catchment, located in Abingdon, to provide good quality river monitoring data. It would be useful if more information is provided on where other gauges will be located to verify hydrology calculations for various storms in some of the smaller watercourses as the Vale understand that these will be installed. The sooner these are in place, the better the level of data that can be provided as it takes time before a suitable record length can be achieved.

Assessment on water quality associated with proximity to the Abingdon sewage treatment works should consider upgrading the treatment works to reduce the risk of

overflows rather than focussing on the location of the intake / outtake pipe and proximity to the works outfalls.

Table 6-12 and 6-13 should ensure that hydrogeology is scoped in for assessment in relation to proposed flood plain storage areas. One concern is the interaction and interrelationship between groundwater storage and flooding from superficial deposits and fluvial flooding as it is likely the case that there is flow in both directions between watercourses and groundwater, which rises to ground levels in many locations close to the position of the reservoir. This partially shows on surface water flood mapping where large extents of fields in this area show water ponding on the surface and this is a frequent occurrence due to the relatively flat area and potential for high groundwater particularly during winter months.

Whilst the report confirms that rainfall will be taken out of the system due to the footprint of the proposed reservoir, so will the reservoir remove a larger footprint of superficial secondary aquifer with storage potential and provide a large barrier to groundwater flow. Given the widespread flooding of field surfaces as highlighted on surface water flood mapping, the effect of direct rainfall reductions will be less pronounced as there is the potential for ignoring the effect that surface water ponding on fields currently has and this needs to be considered.

The Vale understand that groundwater modelling and fluvial modelling are both proposed and being progressed, however there also needs to be suitable consideration for how the various processes including surface water, fluvial and groundwater interrelate, to ensure suitable analysis. Assessment of the effect of development is only as good as the baseline data and this needs to be robust before conclusions can be drawn and potential mitigation measures explored and assessed.

Furthermore, any hydraulic modelling needs to be fully calibrated using the latest survey, rainfall, and hydrogeological data to ensure robust baseline cases are represented before consideration is given to the impact of the development. Impacts must consider all aspects including construction activities and any temporary situations that may be created.

It is considered that the risk of dam breach / collapse should be scoped into the EIA given the potential serious consequences even if the likelihood is considered low.

There is an area safeguarded (under Policy IN7) in the Local Plan 2031 for flood alleviation to provide much needed flood defence upstream of Abingdon. Consideration should be given to ensure that any proposal includes for reducing flood risk to Abingdon.

7 Aquatic Ecology
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

8 Terrestrial Ecology
It has been acknowledged during stakeholder events that c.80% of the proposed development area cannot be accessed for ecological surveys. This represents a fundamental evidence issue and underpins a general concern over how conclusions presented have been reached.

For some species groups (bats, hazel dormice, reptiles), desk-based habitat suitability modelling is taking place to try and overcome survey issues - such as lack of access. This modelling has not been completed, or subject to independent review. As such, decisions on scoping appear to have been made in the absence of this evidence.

Furthermore, the Vale has the following points of disagreement in respect of Table 8-6 of the Scoping Report.

- Hazel dormice (construction and operation) - from a cursory view it seems unlikely that the species is present, however it does not appear that any surveys have taken place, and desk-based species modelling has not been completed. For a proposal of this scale, this is concerning. The development will remove a significant part of the landscape's hedgerow resource, reducing habitat extent and connectivity if hazel dormice are present. Considering their status as a European protected species, it would be more in keeping with the precautionary principle to assume presence (as has been done with Natterjack Toad).
- Local Wildlife Sites (LWS) have been screened out from operational impacts. There is a LWS within the project boundary, and others within 100-500m of the project boundary. A key benefit of the scheme is increased recreational provision for the area. As such, it is reasonably possible that LWS within or close to the development would be subject to increased recreational pressure (negative) - depending on layout of permissive paths/Prow.
- Operational impacts have been screened out on Great Crested Newts (GCN). GCN are present within the onsite LWS and therefore could be subject to negative recreational impacts also. Furthermore, wetland/pond habitat creation and ongoing management could have a positive impact, which should be considered.
- Similarly to GCN, natterjack toads, reptiles and other amphibians are assumed to be present but no account of increased recreational pressure (e.g. dog walking, littering, etc.) has been considered. This is an omission that needs to be included for assessment.

9 Landscape and Visual Effects
The approach using the 3rd Edition GLVIA is appropriate, and the Landscape Visual Impact Assessment (LVIA) work should be used to guide and inform the design of the SESRO scheme to ensure it is a landscape led project.

During the timescale of the EIA process, there is likely to be changes in the current policy documentation such as the Joint Local Plan (JLP) and associated evidence bases, changes to the North Wessex Downs National Landscape Management Plan and further changes to Neighbourhood Plans. Other documents are likely to change such as British Standard guidance in relation to trees and Landscape Institute Technical Guidance.

JLP documentation includes new and updated evidence base and guidance including Landscape Character Assessment, Dark Skies, Tranquillity, Renewable Energy, as well as updated Green Infrastructure Guidance, which should be referenced in the ES.

G.3 Baseline
The JLP and associated evidence base is currently being produced, which includes Dark Skies, Landscape Character. An updated North Wessex Downs National Landscape Management Plan and associated documentation are also expected. National Character Area Profiles are also now digitally based, which should be used rather than the (2013-2015) dates stated.

G.5 Timeframes for Assessment
Care will be needed for this due to the length of the Construction phase and how it differs through the years of construction. The programming of the construction works and phases needs to explore how it can help provide areas suitable for advanced mitigation planting.

G.5.3
While an assessment of effects on night skies, in their own right, or an environmental lighting impact assessment has not been scoped in, there does need to be the involvement of a Lighting Engineer to carefully design any lighting scheme and minimise light spill from any built form, this includes possible lights on towers, light from buildings, water sports club house, visitors centre and café, especially if these are located at a higher level to relate to the water level of the reservoir.

Reference should be made to the JLP evidence base with regards to which lighting zone the reservoir sits within and the associated Lighting Design Guide with regards to reducing light pollution and the impact of lighting on the local landscape.

G.7 Assumptions and Limitations: Landscape and Visual Baseline and Assessment
The Vale queries the exclusion of assessment of private viewpoints (including residential amenity assessment) in paragraph G.7.2. GLVIA paragraph 6.17 states that in some instances it may be appropriate to consider private viewpoints, mainly from residential properties and in the case of the SESRO project, the Vale expects representative viewpoints for residential properties to be used.

It is also noted in Appendix G Table 10 that the description of the viewpoints include that some are from properties, which is contradictory to G.7.2.

G.10 Visual Effects
The appendix does not state what type of photography or visualisation is to be undertaken or reference Guidance Landscape Institute, (2019), Visual Representation of Development Proposals Technical Guidance Note 06/19, although this document is included under G.15 References. The Vale is also aware this guidance is currently under review and may be updated during the timescale of the ES production.

The Vale expects that all viewpoints, including potential illustrative viewpoints, to be Type 4 visualisations Photomontage/ Photo wire (survey/scale verifiable) in addition

to those proposed as Photomontage locations. Wireframes for all viewpoints would allow everyone to understand the extent and height of the reservoir and where embankment tops and associated built development sit in views with relation to the vegetation, landform, skyline etc. Due to the lack of visual references with regards to extent and height of the proposals, it would be difficult to visualise the proposals without wireframes.

Furthermore, Figure 9.3 *ZTV and Potential Viewpoints and Photomontage Locations* is difficult to use due to the base map and the density of the ZTV shading. It is difficult to see where proposed viewpoints are located. It would also help to have the embankment footprint on the plan and at a minimum the whole of the extent of the main reservoir and associated built form should be included in the viewpoint. Adjacent viewpoints are likely to be needed to cover the extent of the view to the reservoir.

The Vale expects a greater number of viewpoints to assess the intake/outtake structures and the relocated outflow from the sewage works from both the National Thames Path, but also the Jubilee Junction path including the loop north from the Junction to Abingdon Marina. While these paths are not on the Prow maps, they are well used and need to be assessed. There will be impacts from the north and south along the National Thames Path but also effects on the river users which also need to be included for assessment.

It is noted that apart from the National Landscape, most views are within the 1km offset from the scoping boundary. Views of the Downs and the Corallian Ridge are an important feature of the local landscape, and it is hard to highlight where views of the reservoir will be able to be achieved from the wider Prow and road network due to the scale of the ZTV. It may therefore be appropriate to create physical features on site to represent the extents and height of the reservoir embankment to provide a visual aid when assessing the wider landscape for viewpoints, similar to how the Silos at Robertson Envirosystems have been highlighted on the viewpoint plans.

Viewpoint 1 indicates how the Downs form a backdrop to views within the local landscape, and viewpoints to the east illustrate views towards the higher Corallian Ridge to the north. There are likely numerous places in the ZTV where these views are part of the daily life of the local people.

Views of the site, the repositioned road, railway sidings are likely to be achieved south of the railway from the footpath network around and to the north of Grove Park Drive. These Prow routes to the west of viewpoint 12 are likely those that provide the connection between Grove and Wantage northwards.

Representative viewpoint D indicates views lost from the existing network of Prow within the SESRO redline area. There should also be an assessment of views from the reprovision of these lost footpath routes as part of the LVIA.

G.13 Assessment of Cumulative Effects

The reservoir will result in the loss of a solar farm and there is an expectation that a reprovision of electricity generation lost from the removal of the solar farm will be part of the reservoir assessment. The reprovision of the electricity generation will result in

its own landscape and visual impacts which may or may not be cumulative in the understanding of Cumulative Effects, but nevertheless will be an additional impact of the proposed reservoir on the wider landscape.

Trees
The Vale is satisfied that Appendix F outlines an appropriate Arboricultural Survey Strategy. The Forestry Commission should be consulted to confirm whether or not any restocking notices served under the Forestry Act exist within the site boundary. If it is the case that a restocking notice exists and that plans would prevent any required planting, this should be included in the Arboricultural Impact Assessment.

10 Historic Environment
The following comments relate to built heritage assets only, as archaeology will be covered by the Oxfordshire County Council Archaeologist.

The Vale is generally satisfied with the approach outlined in the Scoping Report for built heritage. The list of relevant legislation, policy, standards, and guidance includes relevant guidance for heritage impact assessment which are to be employed for the HIA element of the EIA.

Chapter 10 sets out the current known baseline of built heritage assets, taken from a high-level assessment. Figures 10.2 and 10.3 and Tables 23 and 24 within the EIA Scoping Report Appendices provide a list of all known assets within the study area and the 2km scoping area. All the assets identified are to be scoped in.

However, there is concern the 2km scoping area has been drawn based on distance rather than local conditions, in particular topography which would afford some wider extension to areas of higher ground over this particularly flat part of the district.

It is noted that at paragraph 10.5.14 of the Scoping Report, that a ‘preliminary setting study’ may scope out some assets. There is no methodology outlined for this study and it is recommended that the results of this are included within scoping to agree any scoped-out assets. The Vale is concerned that assets could be scoped out between this scoping process and the submission of a final ES which have not been agreed or appropriately assessed given a lack of methodology for this process.

The Vale also consider that Nuneham Courtenay Registered Park and Garden (RPG) and Conservation Area (CA) are scoped into the study. The topography of the RPG and CA, whilst outside the 2km scoping area buffer is such that the area falls within the ZTV and is likely to have a current visual relationship with the site. Given the nature of this asset as one intended and designed to have commanding views across a large area of the Oxfordshire Countryside and landscape, this should be scoped in to ensure any designed views or visual relationship is understood at the outset in order that any significance that derives from the contribution the site makes can be duly considered and preserved.

Paragraph 10.7.4 notes that the scheme is likely to result in a change to the local landscape that will ‘change the legibility of the settings of assets’. It is strongly recommended that a methodology for assessing setting is agreed and that there is

appropriate overlap with the LVIA to consider the landscape contribution to setting and potential impacts.

At paragraph 10.8.8 there is a note that adverse effects will be mitigated but impacts must first be reduced as far as possible with impacts re-assessed and mitigation used as a last resort for residual harm. It is concerning that assumptions are being made as to the level of impact and accepted mitigation in advance of the appropriate level of assessment being done.

10.8.10 – The methodology should include crossover with relevant groundwater impact modelling and assessment to ensure that assets impacted by the changes to ground conditions will be protected throughout the operation period. This will be crucial to assets near the embankments and pipelines as well as those in the existing floodplain which is going to be increased, such as Marcham Mill and listed bridge.

Overall, a clear methodology for assessing setting and the contribution that the site and scoping area makes to heritage assets is needed and despite being just outside the 2km buffer of the site Nuneham Courtenay Registered Park and Garden and the Conservation Area should be scoped in.

11 Traffic and Movement
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable. Notwithstanding, the proposed 5 arterial routes described under 11.4.6 illustrated in Figure 11.1 raise some concerns.

There are concerns with the proposed route via junction 15 of the M4, which would route through A419, A420 and either route though Kingston Bagpuize, Marcham - a village with an Air Quality Management Area (AQMA), and Frilford Lights junction. This route would be unacceptable for construction traffic. It is also unclear why the entirety of the A420 between Swindon Borough Council and Oxford City's ring road is identified.

The same issues arise for Kingston Bagpuize, Marcham, and Frilford Lights junction for the proposed A40 / A415 route. Additionally, this would add SESRO traffic through Ducklington, Standlake and New Bridge (a 13*th* century bridge). This route would be unacceptable for construction traffic.

Thus 2 (M4 junction 15 and A40/A415) of the 5 routes identified for construction traffic are unsuitable and should not be considered for construction traffic. It is also unclear why the section of B4017 Steventon Road between the A34 and Steventon is identified, as it does not provide access to the A34. Furthermore, the routes shown to pass through Abingdon (a town with an AQMA), Drayton, Steventon, East Hendred, Wantage, and Grove would be unacceptable for high construction traffic demands.

Furthermore, the consultee comments table (Table 11-2) does not capture the Vale's request that the SESRO scheme supports the provision of a railway station from the rail sidings near Grove. Preference would be for the rail sidings to be designed and constructed as a permanent structure to then be repurposed for a new Wantage and Grove railway station. Nor do they capture the concerns raised regarding traffic impacts both for construction traffic and operational traffic from the SESRO site.

Lastly, the table does not capture the need identified by the Vale for the SESRO scheme to support the delivery of the Wilts and Berks Canal restoration.

Alongside further development of PROW and active travel to the scheme (as identified in 11.10.1), further work needs to be undertaken to explore public transport provision for SESRO's Masterplan for both rail and bus services. Public transport, dedicated SESRO employee transport, and active travel opportunities should also be sought for the construction phase of the development.

12 Noise and Vibration
The Vale is generally satisfied that the approach outlined in the Scoping Report is acceptable, but there are two areas for amendment.

The decision to rule operational noise from the pumping station and intake/outfall structures is based on assumed adoption of good design practice, without clearly identifying details of those good design measures. To rule these noise sources out without the mitigation measures being clearly specified appears unreasonable. It is a legitimate expectation that EIA shall identify and specify such mitigation.

The decision to rule out noise from operation of valves is also based on assumptions on the siting of the valves. However, the scoping report states that no details are available regarding the presence or location of the valves. To rule these noise sources out with no details being available also appears unreasonable. The ES should identify their location and specify any mitigation.

13 Air Quality
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

14 Geology and Soils
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

15 Materials and Waste
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

16 Carbon and Climate Change
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

17 Communities
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

18 Human Health
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable.

19 Major Accidents and Disasters
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable but consider reservoir dam breach / collapse should be scoped in and requests dam break analysis work to be undertaken ahead of finalising embankment design and for that analysis to be included in the ES.

The safety of the reservoir and its water quality, together with local impacts of its construction are not adequately addressed in the Scoping Report and this needs to be fully detailed. Further assessment is also required on emergency discharge as current proposals to discharge into the river Thames will have an impact on residents and the river.

20 Cumulative Effects
The Vale is satisfied that the approach outlined in the Scoping Report is acceptable and welcomes further engagement and review on updated lists for cumulative development during the production of the ES.

Aspects Proposed to be Scoped In and Out of the EIA
Table 21-1 Scoping Summary
The Vale is in general agreement with the Scoping Summary on Topics to be in and out as set out in this table, save for the following which should be scoped in:

Chapter 18 – Air Quality (operation).
Chapter 19 – Reservoir / Dam collapse (operation).

To demonstrate that topics have not been overlooked, where topics are scoped out prior to submission of the application, the ES should clearly explain the reasoning and justify the approach taken.

Summary of council response
Vale of White Horse District Council is broadly in agreement with the Environmental Statement topic areas set out in the Scoping Report August 2024 and the identified areas of environmental impact subject to the above technical matters being addressed and other matters that should be scoped into the EIA.

Yours sincerely,

S. Walker

Stuart Walker
Major Applications Team Leader