

To: Paul Hickey – Managing Director, RAPID  
David Black – Chief Executive, Ofwat

9<sup>th</sup> June 2023

Dear Sirs,

### **GARD response to RAPID draft Gate 2 recommendations**

You will have seen our response to your consultation, sent on 11th May. I hope that you will have seen, or at least been informed by your staff, that our response contains many criticisms of the Gate 2 process and draft Recommendations. We are very concerned that this process is proving to be insufficiently robust, and has not lived up to its aims of making decisive choices between strategic schemes. A lot of our criticisms have been made previously to RAPID, in meetings and correspondence, so we are disappointed that they do not appear to have been addressed either in the Gate 2 decisions or in recommendations for Gate 3 activities.

We are also concerned that the 'gated' process of screening out options seems to be undergoing 'gaming' by the Water Companies, clear evidence of which is the fact that the only schemes to be dropped so far in this process are those (Eg Fawley Desalination) which the companies themselves refuse to pursue: this is hardly a recipe to success in choosing the most appropriate schemes for the water provision of the south-east out to 2100.

I have attached a pdf document which brings together our recommendations/demands from the GARD response. These are all listed in our response, but have been grouped for convenience, with footnotes cross-referencing evidence to support our concerns. Many of these (those on Safety and Flooding risks of the Abingdon Reservoir (SESRO) project, 'true' cost of projects, a coordinated approach to the STT schemes, an independent review of the stochastic modelling, the early inclusion of study of an alternative 'Thames to Affinity transfer' connected to an existing London reservoir - as suggested by Chalk Streams First ) - should be dealt with ***before the Gate 3 evaluation*** at some interim checkpoint.

We also attach a shorter pdf relating to the actions which we feel the Environment Agency should make in publishing transparent and clear documents justifying the various arbitrary limitations they have put on some options, especially, the water transfer schemes. This 'ultra-precautionary' approach contrasts markedly with the cavalier attitude to the Emergency Storage requirements of the SESRO design, and the lack of detail on how water treatment will be carried out on the currently very unsatisfactory water from the Thames (polluted by continual Thames Water sewage overflows) which would be used to fill SESRO in winter.

I request a formal response from you on these matters, and a justification of your position if you choose to ignore our important requests. I also request a meeting, preferably with other Oxfordshire Stakeholders who have concerns, to discuss these matters. I would very much prefer to sort these matters out without making challenges by other means to your (essentially) pre-DCO process.

Yours faithfully,

Derek Stork

Dr D Stork CPhys FInstP,  
Hon Chairman,  
GARD.

[www.gard-oxon.org.uk](http://www.gard-oxon.org.uk)

cc: David Johnston MP - Wantage

Layla Moran MP -Oxford West and Abingdon

Cllr Liz Leffman - Leader OCC

Cllr Peter Sudbury - Cabinet Member for Climate Change, Delivery and Environment OCC

Cllr Bethis Thomas - Leader Vale of White Horse DC (VWHDC)

Cllr Neil Fawcett - Cabinet Member for Strategic Partnerships and Place VWHDC

Cllr David Rouane - Leader South Oxfordshire District Council

Cllr Sally Povolotshy - Chair , VWHDC

Cllr Andy Cooke , Drayton Ward, VWHDC

Cllr Richard Webber, Drayton and Sutton Courtenay ward, OCC

Helen Marshall - Director, Oxfordshire CPRE

Wantage and Grove Campaign Group,

Steventon Parish Council

East Hanney Parish Council

East Hendred Parish Council

Drayton Parish Council

Ardington and Lockinge Parish Council

Grove Parish Meeting