

GARD Key Points for responding to the Affinity Water Consultation

Please consider the following when responding to Affinity's consultation which is available here: <https://stakeholder.affinitywater.co.uk/have-your-say.aspx>

The Good

- Despite calls by several river and angling lobbies for the reservoir to be built to reduce the need to abstract water from stressed chalk streams, Affinity's own plan proposes a much quicker way of achieving this using water from Anglian's existing Grafham reservoir. **Affinity and Thames Water should make clear to concerned stakeholders that planned sustainability reductions for chalk streams will be in place by 2025, rather than having to wait until the late 2030s for the reservoir.**
- The Affinity 'Supply 2040' scheme, allowing more transfer of water from South to North of their Central Region, is welcomed and should be brought forward as much as possible to increase adaptability in the response to any increased demand, allow larger and quicker reductions in chalk stream abstractions and improved ability to manage London supplies.
- Affinity has surplus water in its southern supply zones that could be used, via 'Supply 2040', to meet shortfalls in the north of its area.
- A link to Thames Water's London supplies, via 'Supply 2040', would allow much larger reductions to chalk stream abstractions than currently planned, with only a small impact on London's supplies, because 90% of the water from London would be returned to London as enhanced chalk stream flows. This would be a much faster and less costly way of relieving chalk streams than waiting for Abingdon reservoir.

The Bad

Population Forecasts

- Affinity's forecast for the rate of increase in population is based on local authority house building plans that often struggle to achieve even 40% of what is planned. Adjusting the planned figures by 'real world' achievement rates would reduce the forecast increases in population by up to 50%.
- Current long-term trends in the UK population are downward with reducing fertility and stalled longevity increases. Other European nations such as Germany and Italy are already seeing falls in their natural population with levels only maintained through immigration. The UK population fell in the 1970s and could do so again. Large projects that add unnecessarily to customer bills and have an adverse environmental impact should not be considered until the need has been proved absolutely.

Leakage

- Despite a large percentage of newer housing stock in their region, Affinity leakage rates are above most other water companies. Their leakage rates are 59% higher than South East Water, who cover similar areas (8.1 m³ per km of pipe per day compared to SE Water's 5.1).
- The National Infrastructure Commission and Ofwat have set water companies a leakage reduction target of 50% between 2020 and 2050. While all other water companies have accepted this, Affinity's revised draft Water Resource Management Plan only aims to achieve a 40% reduction by 2050.
- Given that Affinity's leakage rate is higher than most other water companies, they should aim for a greater than 50% reduction in their leakage aiming to achieve the average national leakage rate.
- Should Affinity achieve a full 50% (or more) reduction in a timely manner, the need for a resource such as Abingdon reservoir would be pushed back many years. Combined with other measures available to Affinity, the need for any output from a reservoir could be removed completely.

Consumption

- Affinity has placed insufficient priority to measures that could reduce individual consumption toward industry best practice. Its metering rate is already below the industry average and it has only managed to increase metering by 3% over the last 4 years – again well behind many other companies.
- Affinity's medium and long-term plans aim for 80% metering by 2025 and 90% by 2045, yet Anglian Water aims for 95% meter penetration by 2030. Why can't Affinity achieve such targets?
 - Why is Affinity keen to spend so much money on a new source, such as the reservoir, when much of the output will be either wasted or lost through leakage? Why isn't the money being spent instead on measures that save water and mean the reservoir would not be required?
- Anglian Water has found that installing smart meters reduced usage another 11% beyond the savings achieved by installing dumb meters. Affinity plan to continue installing dumb meters for several years and instead should aim to fit smart meters much sooner.
- Affinity is planning for hardly any improvement in individual water usage after 2025. Why isn't it considering the ability of smart meters, the effect of potential water appliance labelling and new house water efficiency to drive this usage down to similar levels as other water companies?

The Ugly

- About 70% of the water supplied to Affinity is almost immediately returned as treated effluent to the Rivers Thames and Lea and subsequently reused by Thames Water to supply London. Affinity customers will be charged 100% of the cost for a net 30% of the water supplied. This is a very bad deal for Affinity customers. GARD has proposed several ways for Affinity to easily increase its water supply using a mix of Thames Water's surpluses and existing London supplies. Since 70% of this could be returned to the Thames upstream of Thames Water extraction points, it would be available for reuse, meaning net usage by Affinity would be a fraction of what they are currently saying they need.
- Affinity plan to build a 150 million cubic metre reservoir near Abingdon that would lie across and obstruct a flood plain, much of which is Flood Zone 3. Earlier studies by Thames Water indicated that any reservoir larger than 75 million cubic metres would not leave enough space to create compensation zones for the lost flood zone. A large reservoir will inevitably lead to increased flooding risk in the local villages and Abingdon. Recently, a flood alleviation scheme for Abingdon has been placed on hold, potentially because the area available is constrained by the reserved space for the reservoir, raising costs. Why haven't Affinity and Thames Water conducted full flood risk studies for this scheme?
- Despite proposing the reservoir, Affinity has made no effort to engage with local councils and communities and discouraged their attendance at stakeholder meetings.
- Even just using Affinity's proposed plans and sensible management a water source such as the reservoir is not needed until 2050 at the earliest. By considering well understood alternative sources of supply, rather than the poorly researched and little understood reservoir option, Affinity could avoid the need for a reservoir completely.
- Elements of the strategic environmental assessment for the reservoir conducted by Thames Water were contested by various organisations and we consider it unfit for purpose. Affinity should commit to conducting its own strategic environmental assessment and explain why various factors present at this site, which have led to other similar sites being dropped, have not been taken into account.