

Action for the River Kennet Avebury, Elcot Park Marlborough Wiltshire SN8 2BG

15 March 2023

# Action for the River Kennet response to Thames Water's Water Resource Management Plan

### Summary

Overall ARK supports Thames Water's approach, we welcome the commitment to reduce abstraction, manage water demand and prioritise chalk streams. We are disappointed by the leakage reductions proposed for the SWOX region and believe that the per capita consumption targets are too low.

## Water transfers

We support the creation of a water transfer network and would like to see transfer options prioritised. We have concerns that the large scale options such as SESRO and STT are a long way in the future, and offer uncertain benefits for the Kennet catchment, with the pipe to SWOX not scheduled until 2050 and not under all scenarios. If the SESRO development is to go ahead we would like certainty that it will benefit the chalk streams in the upper Kennet, which was a primary motivation for building it the last time is was seriously considered. In the interim we would prefer to see Farmoor used more effectively to supply Swindon in normal years.

We welcome the proposed water transfer from Wessex to support the Kennet Valley and would like more details of that scheme.

# Abstraction reduction

We are concerned that there needs to be a clear and proportionate approach to abstraction reduction to ensure that time and money is spent reducing those abstractions that have the greatest impact. We support the approach proposed by the CaBA chalk stream restoration strategy that suggests a lower overall reduction in abstraction achieved in a targeted way, rather than a blanket ban on all groundwater use. The latter may not be realistic in any reasonable timeframe. In instances where abstraction reduction is not possible we support the concept of moving abstractions downstream to points where the environmental impact will be lower. With this in mind we would like to be reassured that the development of the

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5MI/d groundwater abstraction in the lower Kennet at Mortimer in 2042 would occur **after** abstraction reductions (of between 3.7MI/d and 50MI/d) identified for the upper Kennet.

We consider that the West Berkshire Groundwater Scheme is a valuable resource, which has an important role in extreme drought years, but should not be hard wired in to business as usual day to day resource options.

If rivers like the Kennet are to be restored, then improvement in water quality is as important as re-naturalising flows. Expenditure on abstraction reduction must be balanced against improvements in waste water treatment, so it is vital to prioritise abstraction reductions to those which are most needed.

## **Demand management**

We welcome the emphasis on demand management. As a priority we would like to see smart metering and stepped tariffs used to help customers manage water use. We think there will be a need for joined up publicity and messaging from across water companies and NGOs to raise awareness of the need to use water wisely and create a better understanding of the water resource challenges we all face.

We have concerns that Thames Water is being less ambitious in its per capita consumption targets compared to other water companies, and although the reasoning behind this stance is carefully explained we think that as smart water metering provides more data Thames Water will be in a stronger position to target the super-high users and bring this figure down, in line with government targets and those of other water companies.

### Leakage

The level of leakage reduction proposed for the SWOX and Kennet Valley zones is low. At only 14% in SWOX and 30% for the Kennet Valley, both are well below the government target of 50% by 2050.

If Thames Water were to achieve the government's targets for leakage reduction and per capita consumption there would be no need to export water from the Kennet Valley to Swindon, properly protecting the chalk stream environments of the Kennet Valley.

## Nature Based Solutions and the catchment based approach

We support investment in nature based solutions and a catchment based approach to build resilient catchments and engaged communities.

Richard Clarke Chairman, Action for the River Kennet