

Appendix 8: Buckinghamshire County Council

| 1. Buckinghamshire County Council | | |
|-----------------------------------|---|--|
| 1.1 | Representation | We strongly welcome the intention to reduce abstraction from chalk catchments to the full level proposed by the Environment Agency and to move to a higher level of drought resilience in supply system. The health of our internationally precious chalk streams is of considerable concern to the County Council, noting that 0% of chalk streams in Buckinghamshire meet good status under the Water Framework Directive. This is a very unfortunate situation and one that needs to be actively improved. |
| | Our Response | We welcome your comment and will continue to work with the Environment Agency and other stakeholders to investigate and deliver reductions in abstraction as appropriate. Wider improvements to chalk streams through our river restoration programme are outlined in our Business Plan 2019. |
| | Summary of any change to our final WRMP | Further reduction in abstraction from the Chalk is explored as a scenario in Chapter 5 of the fWRMP19. |
| 1.2 | Representation | In our comments on the previous draft we expressed concerns that it was limited in its ambition on Water Framework objectives. We are not convinced from this document that this concern has been adequately addressed. It would be good to see you having a much more positive ambition to improve the quality of waterbodies impacted by abstractions and to ensure that the quality of the chalk streams is not impacted and indeed positive steps made to enhance by other options. |
| | Our Response | We welcome your representation. Please refer to our Business Plan 2019 in which wider improvements to chalk streams through our river restoration programme are outlined. |
| | Summary of any change to our final WRMP | N/A |
| 1.3 | Representation | The intention to move towards reduced consumption and reduction of leakage within customer properties is also seen as a very positive move. It would also be good to see the same commitment to reducing leakage on the network as 18.5% reduction in leakage seems quite small in light of the fact of the high amount of water “lost” in leakage. |
| | Our Response | We fully support the ambitions to substantially reduce leakage by 2050. Our initial aim is to achieve a 50% reduction in leakage between 2015 to 2045. This 30-year programme to reduce leakage by 50% is planned to deliver five years earlier than most other water companies because we started the process in 2015, and will already have delivered a 14% reduction by 2020, followed by a further 18.5% reduction between 2020 and 2025. We will then aspire to achieve a higher level of reduction, to 57% from the 2015 position, which will allow us to reduce leakage by 50% from our 2020 position. Clarification of the 50% target and the ambition for 50% post AMP7 (i.e. 57% overall) is included in the fWRMP19 along with clarification of how we have handled mains renewals for leakage and trunk mains schemes. Explanation of how we will achieve leakage efficiencies and details of our leakage reduction strategy are provided in Technical Report 4.8: Leakage Strategy Report and referenced in the fWRMP19. |
| | Summary of any change to our final WRMP | An update regarding leakage is provided in Chapter 6 and Technical Report 4.8: Leakage Strategy Report in the fWRMP19. |

| 1. Buckinghamshire County Council | | |
|-----------------------------------|---|--|
| 1.4 | Representation | Although there is an understanding in principle for the need for larger infrastructure projects in the future to accommodate water demand from new growth i.e. possible use of Grand Union Canal, there is concern over water quality issues and a different water chemistry being transferred into and damaging the fragile chalk stream network. Not only this the County Council would expect that any new water infrastructure projects would deliver biodiversity net gain in line with national policy in the DEFRA 25 Environment Plan. |
| | Our Response | As described under section 10.2.4 of the SoR, we will be carrying out detailed water quality and environmental investigations on the GUC transfer scheme prior to 2023 and before we commit to development of the scheme. |
| | Summary of any change to our final WRMP | N/A |
| 1.5 | Representation | Although climate change projections are covered in the Plan it is not necessarily clear as to how climate change predictions for changes in rainfall patterns (drier summers with more intense rainfall events and wetter winters) will impact on options chosen in the long term especially with reference to the environmental impacts. |
| | Our Response | A further explanation to describe the impact of climate change on each preferred supply and demand option is included in fWRMP19 Technical report 4.5 Supply Side and Constrained Options Report Vol 1, Appendix E. |
| | Summary of any change to our final WRMP | Further information is available in fWRMP19 Technical report 4.5 Supply Side and Constrained Options Report Vol 1, Appendix E. |
| 1.6 | Representation | Finally, I would suggest that close consideration is also given to engaging with the emerging Environmental Land Management System (ELMS) in terms of how future payments for land management can be closely aligned to river catchment management objectives. |
| | Our Response | Thank for your response. Proposals relating to Eco System Services and catchment management are detailed in our Business Plan 2019. |
| | Summary of any change to our final WRMP | N/A |