



HOUSE OF COMMONS

LONDON SW1A 0AA

To whom it may concern

Re: Teddington Direct River Abstraction Consultation Response

I am writing in response to Thames Water's latest consultation on the Teddington Direct River Abstraction (TDRA) scheme.

Fundamental issues with the consultation process

This scheme has been highly controversial from the moment the public became aware of it in January of this year. Since the first consultation, I have received more than 300 emails asking for my assistance in preventing its construction and more than 28,000 people have signed a petition calling for the scheme to be abandoned. Furthermore, I would like it noted that all impacted Members of Parliament and dozens of affected councillors, collectively representing almost a quarter of a million people, have raised serious concerns about the effect this project would have on our communities and local environment.

In light of this, I believe Thames Water's approach to the consultation has been extremely poorly considered. It has not asked residents to comment on whether the scheme is in any way suitable for our community, but rather framed the consultation as a question of how we believe the project should be constructed.

This framework does not provide residents with a clear opportunity to object outright to the scheme. If they engage in good faith with the consultation and suggest a route, even when they would rather it is not built at all, their response could be seen to tacitly support the project in some form. Furthermore, by asking residents to make a decision on the pipeline route, they are asked to decide whether they should have to live with the noise and disruption of construction or if they should inflict that same noise on their neighbours and other parts of the community.

Due to the fundamental weaknesses of the consultation process, any conclusions that can be drawn from its results should be treated extremely carefully. It is vital that any response which details a suggested route should not also be taken as support for the scheme.

Construction Impacts:

It is good to see that Thames Water has listened to feedback from previous consultations and were able to provide some critical details on the scheme relating to possible shaft placements.

Unfortunately, as the traffic impact assessment has not been completed, respondents could not make a truly informed decision as to which shaft placements would cause the least disruption. I recognise that, given the cost of these assessments, it would not be feasible to carry them out on a significant number of shaft sites that would not be selected. However, preliminary research should have been conducted to allow residents to offer a somewhat informed opinion.

While Thames Water has offered “mitigations” to reduce the impact that the construction would have on local traffic levels and congestion, it is undeniable this project would cause an immense amount of disruption to the local community. Ham is a relatively isolated neighbourhood, flanked to the east by Richmond Park and the Thames to the west. One major road exists connecting Ham to Richmond and Kingston and the addition of thousands of heavy goods vehicles to this choke point is cause for serious concern. Should the development take place at the same time as construction for the Ham Close redevelopment this could place an unacceptable pressure on local road networks.

It is also important to note that the majority of works will be conducted in an area just south of Dysart Avenue. This is a small, residential street and completely unsuited to a constant flow of construction vehicles.

In addition to the potential traffic impact, it is likely the TDRA would have a substantial negative impact on the ecology of the Metropolitan Site of Special Interest for Nature Conservation that comprises Ham Lands. While I can acknowledge Thames Water’s stated commitment to biodiversity net gain and reconstruction, this does not discount the immediate impact the temporary destruction of acres of nature reserve would have on local flora and fauna. Once mature trees are felled, they cannot be replanted, and once badger setts are destroyed, and their occupants killed or driven off, they cannot necessarily be restored. These are two specific examples of the damage this project could do to the area, but Thames Water’s own documentation cites a potential impact on a wide array of wildlife.

Finally, it is concerning that this site was advanced as the best option, given its importance to local conservation efforts. Ham Lands is protected by multiple layers of legal environmental protections on both the local and regional levels. These were intended to prevent any development on the site. By selecting it, Thames Water have shown a serious disregard for the wishes of the community from the onset of this project.

Water quality concerns

In a year when the Teddington DRA does not operate, and thus provides no value, except as a reserve, it will release around 9.1 billion litres of effluent into the river above Teddington Lock.

Thames Water has been adamant this effluent will be of a higher quality than the river water it is entering and has defended the tertiary treatment process as entirely adequate to ensure water quality remains as good, if not better, than it is now.

Unfortunately, I have yet to see any indication that the tertiary treatment facility will adequately remove polyfluoroalkyl substances (PFAs) or bacterial and viral contamination. Both could have a significant impact on the local communities of swimmers and river users and also represent a possible public safety risk if their relative concentrations rise to above current levels. While water recycling projects exist across the UK, few, if any, recycle water from London, and as such, they are unlikely to have dealt with the same level of pharmaceutical and chemical contamination that exists in London’s wastewater. Although I do not doubt that Thames Water will meet all required national standards, EA regulations are set on the national level. As such, they may not be applicable to our local ecology or effective in regulating effluent generated from such a high-density urban environment.

It is important to note that in some respects, recent evidence shows the water near to Teddington Lock is of an excellent quality. Research conducted by local community groups has found that the water in the area currently carries around 50 e-coli colonies per 100ml. While bathing water status is dependent on a multitude of factors, one test requires the concentration of e-coli to be below 500 colonies per 100 ml. As such, by some measures, the river water is already of bathing water quality. I would urge Thames Water to release the results of any evaluation it has conducted of the likely concentrations of bacteria, viruses, and parasites in the final effluent as this is essential to allowing the local community to make an informed decision on the projects ecological impact.

As London's population grows, further contamination of wastewater is extremely likely. New chemicals may become more common just as we have seen with the rise of PFA, and treatment systems will need to be able to adapt to them.

Unfortunately, Thames Water has repeatedly stated that space restrictions at Mogden will limit the level of water treatment possible at the site. Should higher levels of treatment become necessary as population density increases and water quality declines, it may put the future utility of the project into question.

In summary, this project has not been effectively shown to adequately consider local residents, the quality of the river water, or the ecology of the land it will be built on. While Thames Water has made some efforts to improve the project and bely residents' concerns, the scheme is fundamentally flawed, and no amendments, beyond a wholesale return to the concept stage, will make it acceptable.

It is my view, and the view of my constituents, that the project should be rejected in its entirety, and I would urge Thames Water to consider an alternative plan to secure London's water supply for future decades.

Yours sincerely,

A handwritten signature in cursive script that reads "Sarah Olney". The signature is written in dark ink and is positioned below the typed name.

Sarah Olney
Member of Parliament for Richmond Park