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7 March 2026

Dear Anna

**Subject: Technical Viability of Teddington Direct River Abstraction (TDRA) in light of the February 2026 PFAS UK Plan**

I am writing to you regarding the ongoing development of the Teddington Direct River Abstraction (TDRA) scheme and the critical role of the Mogden pilot plant trials in supporting the scheme's viability.

Thames Water's preference for the TDRA is predicated on the efficacy of a "less intensive" Tertiary Treatment Plant (TTP) utilizing Moving Bed Biofilm Reactor (MBBR) and mechanical filtration. However, the recent publication of the PFAS UK Plan (February 2026) introduces a significant new regulatory hurdle that appears to challenge the fundamental design assumptions of this project.

Specifically, the PFAS UK Plan confirms that the Drinking Water Inspectorate (DWI) guidance, updated in August 2024, now requires monitoring and reporting on the sum of 48 named PFAS compounds, with a reporting threshold of 0.1 µg per litre. Crucially, the government has now committed to consulting on turning this into a statutory (legal) limit for public supply regulations.

In light of this, I would like to raise the following regarding the current status of the Mogden pilot results:

- **Scope of Compounds Tested:** Do the current trials at the Mogden pilot plant monitor and test for the full suite of 48 PFAS compounds identified in the August 2024 DWI guidance and the February 2026 plan? The Strategic Water Quality Risk Assessment (SWQRA) previously highlighted only PFOS and PFOA as primary limiting hazards.

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- **Cumulative Limit Compliance:** Has the pilot plant demonstrated that the proposed TTP technology (MBBR and mechanical filters) can reliably keep the cumulative sum of these 48 compounds below the 0.1 µg/l threshold? The PFAS UK Plan explicitly notes that meeting these tightening regulations will be "very challenging" for both new and existing works.
- **Pathforward for Insufficient Results:** If the current Mogden trials have not yet addressed this broader list of 48 chemicals, how does the Environment Agency propose that Thames Water validates the scheme before the September 2026 Gate 4 submission?
- **Impact on Best Value Selection:** Given that more intensive alternatives like Beckton Water Recycling utilize reverse osmosis—a technology better suited for high-level contaminant removal but at a significantly higher cost—at what point will the EA require a pivot to the "Adaptive Plan" switch if the TDRA technology fails this 48-compound test?.

**Request for Transparency and Data Sharing:** The sources indicate that initial results from the Mogden pilot plant have already been provided to the National Appraisal Unit (NAU) and that an informal pre-application Permitting Technical Note was submitted to the National Permitting Service (NPS) in July 2024. Furthermore, I understand the NAU has undertaken to provide guidance on which emerging chemicals to include in future risk assessments. I formally request that the Environment Agency share:

- The results from the Mogden pilot plant as submitted to the NAU and NPS to date.
- Copies of the informal pre-application feedback and guidance provided back to Thames Water regarding permit limits, particularly concerning Contaminants of Emerging Concern (CECs) and the 48 PFAS compounds.

The February 2026 plan emphasizes the need for "Best Available Techniques (BAT)" to minimize PFAS. If the pilot results indicate the current TTP cannot survive a 48-chemical statutory limit, it is vital that this is identified and shared transparently before further bill-payer funds are committed to the DCO application process.

I look forward to your response on how the Environment Agency is overseeing this critical water quality checkpoint.

Yours sincerely,

Ian McNuff

Founder member, Save Our Lands and River