



HOUSE OF COMMONS
LONDON SW1A 0AA

Thames Water WRMP Consultation
Thames Water Utilities Ltd
Clearwater Court
Vastern Road
Reading
RG1 8DB

21 March 2023

To whom it may concern

Re: Response to Consultation on dWRMP24

Please accept this letter as my submission to Thames Water's public consultation on the draft Water Resources Management Plan 2024 (dWRMP24), which draws to a close on 21 March. In particular I wish to comment on the proposed Teddington direct river abstraction (DRA).

As Member of Parliament for Twickenham, I cannot lend my support to this proposed scheme in view of the lack of data on human health impacts and environmental impacts, and without clarity on how it will be monitored, or how strict standards on water quality will be enforced. I have held discussions with both representatives of Thames Water and local community groups and businesses who regularly use the river, largely for recreational activities. I have also been contacted by a large number of local residents who are not members of any local group.

I recognise the crucial importance of producing a strategic plan to mitigate future drought, particularly given the accelerating impacts of the climate crisis, and understand that a range of options need to be considered. However, no options should be progressing without rigorous and fulsome impact assessments or without adequate scrutiny and accountability to the communities they will impact.

In Twickenham and Teddington, the River Thames is woven into the very fabric of our area. It is a part of our area's history, identity and its beauty as one of the greenest boroughs in London.

I have a duty to represent the views, concerns and interests of my constituents and aim to do so in my full response to the consultation, which I lay out below.

Public Engagement

Before commenting on some of the detail of the dWRMP, I would like to begin by expressing my dismay at Thames Water's approach to this public consultation period.

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Whilst recent steps to improve engagement, including through holding further information events, were welcome, I regret that Thames Water had to be persuaded into doing so as a result of media coverage and pressure from local representatives, including councillors and local MPs.

Our community is one that is passionate and very well-informed about the local environment and proud of its river heritage. It is clear that Thames Water initially failed to understand the strength of feeling in Twickenham and Teddington with regards to the river and the proposed plans for the Teddington DRA. Any further consultation events must be announced in a timely, transparent manner to address some of the damage done to trust in Thames Water locally.

In order to reassure local residents, I urge Thames Water to commit to clearly communicating the decision-making process for the dWRMP, including its criteria for assessing the viability of the DRA as further data is collected, as well as which bodies are responsible both for the decision-making and scrutiny at every stage.

I also regret that the Q&A document which was promised to respond to the many unanswered questions of local residents from the webinar held by Thames Water in February has not been published in time for this round of public consultation closing. It is disappointing that local people and stakeholder groups did not have the opportunity to read Thames Water's responses to their queries before responding.

Approach to the Environment

With regards to Thames Water's approach to the environment and protecting the unique and precious ecology of the River Thames and its tributaries, there is a significant lack of trust amongst local residents that the environment is a priority.

This lack of trust is a natural consequence of repeated raw sewage discharges into the Thames in our area, most significantly at Isleworth Ait. With 530 hours of sewage discharges along our stretch of the Thames in 2021 alone, it is crucial that Thames Water demonstrates action in preventing raw sewage discharges locally if trust is to be rebuilt. Assurances must also be given that any construction works at Mogden Sewage Treatment Works will not increase the likelihood of sewage discharges.

The most significant concern here, however, is the lack of completed environmental impact assessments or human health assessments, meaning Thames Water simply cannot offer meaningful reassurance over the impact of this scheme on the local environment at this stage. I urge Thames Water to publish these assessments once completed without delay and communicate the results clearly to local residents and elected representatives.

Local residents are particularly concerned over the level of monitoring around the impact of pharmaceuticals, so-called forever chemicals (PFAS) and microplastics that may be discharged into the river if the scheme were to be built. Alongside modelling and pre-emptive studies of the river environment, I therefore urge Thames Water to commit to real-time monitoring of the impact on water quality as part of the Teddington DRA scheme, should it be approved.

We also ask for clarity over what recourse will be available to local residents, representatives and river groups to raise concerns over impacts to the environment and ecology of the river, including their ability to use the river for recreation.

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While the commitment to Biodiversity Net Gain is positive, local representatives and the community want to see guarantees that it will be delivered within our area, expanding habitats and increasing biodiversity, both in terms of the river and the land areas that will be developed in delivering the scheme.

Reducing demand for water

In terms of the measures included in the draft plan to reduce the demand for water, I welcome the steps Thames Water are taking to fix leaks – however, these are not nearly enough. As the need for the WRMP makes clear, water is a precious resource, yet Thames Water continues to lose a quarter of its supply every single day due to leaks.

I strongly believe that there should be a greater focus on fixing leaks or else a clear explanation as to why this is not a viable pathway for increasing London's water resilience.

Local residents have also pointed out that Thames Water's target for water use reduction per head is significantly less ambitious than the national target issued by Defra. The national plan is to reduce water usage per person to 110 litres per day by 2050, whereas Thames Water's dWRMP reduction goal is 123 litres.

I am therefore concerned that the measures to reduce demand in the WRMP are unambitious and urge Thames Water to explain this discrepancy.

Best value for customers

A concern that has been raised time and again by local people is the definition of "best value" that Thames Water and other water companies are using to develop the WRMP.

In the context of the Teddington DRA, it has become clear that Thames Water does not fully appreciate the commercial and recreational value of that stretch of the river. Having met with a varied group of stakeholders – from local residents associations and environmental groups to direct river users – it could not have been clearer how popular and well-used the river is, both upstream and immediately downstream of Teddington, enriching the lives of local residents and many more who travel to our area to enjoy water sports and riverside leisure.

I therefore urge Thames Water to produce a full assessment of the level of commercial and community activity on the Thames around Teddington and clarify what impacts this scheme would have on local residents, businesses and other organisations who use the river or are located on its banks.

Any reduction in access to the river – whether that be due to physical constructions, navigational impact or human health concerns – must be factored in when assessing the "value" of this scheme in comparison to alternatives based on other sections of the river. Thames Water must publish the specific criteria and scoring system used to evaluate 'best value' for the schemes and explain how they reached these criteria.

Operational Concerns for Teddington DRA

At this very early stage of this project, the lack of impact assessments on human health and the environment, and the sheer number of unanswered questions that remain, I cannot consider supporting the Teddington DRA scheme, regardless of any drought mitigation measures it may provide to London.

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Beyond the environmental and broader design process concerns of residents, a number of local groups have also highlighted what could be a significant operational flaw. Residents of Trowlock Island and the Broom Residents' Association have highlighted concerns surrounding backflow of the Thames above Teddington Weir.

They point out that during periods of high flow, the river can – and regularly does – top Teddington Weir, resulting in the river flowing inland along the stretch of the river where Thames Water are proposing to build the river abstraction and effluent discharge points for the Teddington DRA.

The inland flow would result in effluent from the discharge flowing upstream towards the abstraction point, which presumably represents a risk of that effluent being abstracted to the Thames Lee Tunnel and ultimately into the reservoir – resulting in a drinking water quality issue. This may also be impacted by works to be carried out under the River Thames Scheme which would expand capacity at Teddington Weir.

I therefore urge Thames Water to urgently clarify what assessments they have made of the frequency and volume of backflow of the Thames at Teddington Weir in an average year and an explanation of how this would impact the Teddington DRA.

Additionally, if Thames Water choose to discharge the DRA's sweetening flow above Teddington Weir, as opposed to at Isleworth Ait, explanations must be given as to how inland flow of the river would impact on the quality of the water entering the Lee Valley Reservoir all year round.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Munira Wilson', written in a cursive style.

MUNIRA WILSON MP
MP for Twickenham