



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 statutory consultation on the Teddington Direct River Abstraction (TDRA) scheme.

Water management must be one of the priorities of water companies across the country, in particular considering the impacts of climate change. They must properly invest in schemes that support our environment and biodiversity, allow for sustainable water usage by consumers and industry, and offer value for money. I do not believe that Thames Water's current plans for the Teddington Direct River Abstraction properly achieve any of these goals.

This response to Thames Water's statutory consultation on the TDRA draws from a wide analysis of documents, including the Chapters found within the Preliminary Environmental Information Report (PEIR), Water Resource Management Plans (WRMP19 and WRMP24), and related consultation documents. It also considers questions and concerns previously raised by local residents and community stakeholders.

1. A Flawed and Inaccessible Consultation Framework

From the outset, the structure of this consultation has constrained the public's ability to fully and fairly assess the scheme. The framing of many questions implies an assumption that the project will go ahead and seeks opinions only on how to construct it. Residents are not given an equal platform to express opposition to the scheme itself, and any comments on construction routes or shaft locations risk being misinterpreted as tacit support for the project.

Furthermore, the consultation materials are vast and complex. With over 1,500 pages of technical documentation, the time required for the average resident to read, understand, and respond meaningfully is excessive. Expecting lay respondents to navigate multiple chapters of environmental, engineering, and financial analysis without summaries, infographics, or clear navigation tools, undermines the accessibility and fairness of the consultation.

2. Inadequate Stakeholder Engagement

Although Thames Water has cited consultation with a number of parties, it remains unclear the full extent to which environmental groups, residents' associations, and other stakeholders were engaged prior to publication. Chapter 9, Clause 9.3.2, for instance mentions a limited number of stakeholder contacts but does not include mention of environmental groups or residents' associations. There is also no indication that environmental experts or public health authorities were invited to directly assess key issues on which they could offer specific insight.

Furthermore, Chapter 14, Clause 14.5.18, for example, references WHO guidance for night-time noise levels but makes little mention of other WHO standards. Chapter 16 cites Public Health England but does not confirm whether direct consultation was held. This pattern of partial citation without substantiating evidence or published meeting minutes makes it impossible to verify the integrity of stakeholder engagement.

3. Environmental Risks and Regulatory Concerns

Numerous sections of the PEIR raise serious environmental red flags. In Chapter 19, Table 19.7 confirms that a number of sensitive receptors will experience significant adverse (or at least some level of adverse) impacts, many of which are deemed unavoidable. This is particularly troubling given the ecological importance of Ham Lands, which is protected under local and regional conservation designations.

Chapter 7, Clause 7.4.11 states that works will be timed to avoid sensitive periods “where reasonably practicable,” but gives no criteria for determining what is “reasonably practicable”. Meanwhile, Chapter 7, Clause 7.8.43 dismisses Tudor Drive as unsuitable for bat roosts without evidence of independent review.

Additionally, Chapter 6, Clause 6.8.2 and Table 6.10 refer to ecological assessments based on “professional judgment,” yet do not disclose the identity, independence, or methodologies used by those professionals. Cumulative effects on wildlife, such as phytoplankton, and impacts on arboriculture and protected species, are frequently deferred to future assessments.

Regarding water quality, Appendix 5.1 confirms exceedances for several hazardous substances, including PFAS and pesticides. In Section 16.7.60, the list of contaminants is still being refined, which makes it impossible to assess whether key health risks will be adequately mitigated.

The Water Framework Directive (WFD) is another area where compliance appears speculative. Chapter 5 indicates that WFD assessments will follow as a ‘next step’, meaning regulatory compliance is assumed but not proven. In addition, appendix 5.3 lists multiple water bodies in the area as having “poor” environmental status, yet the TDRA is not shown to improve this condition in any tangible way.

4. Tertiary Treatment and Effluent Discharge Concerns

Thames Water maintains that water returned to the Thames will meet or exceed the quality of the water already in the river. However, there is insufficient information to support this claim. Notably, the tertiary treatment planned at Mogden STW is not capable of removing micropollutants such as PFAS, pharmaceuticals, and endocrine-disrupting compounds.

Recent EU updates to the Urban Wastewater Treatment Directive (2024/3019) will mandate quaternary treatment for large populations by 2045. While the UK may not be bound by these standards post-Brexit, many in the community believe we should aim for the highest levels of treatment to future-proof against chemical risks, and that therefore, Thames Water should evaluate the possible implementation of quaternary treatment at the Mogden STW.

Chapter 16, Clause 16.7.58 confirms high concentrations of PFAS in the Thames near Teddington. At the same time, Clause 16.5.6 notes that the full list of contaminants is still under development. Given the known risks associated with PFAS, Thames Water must explain what methodology will be used to determine which pollutants are removed and how human and ecological health impacts will be measured.

5. Construction Impacts and Risks to Communities

Chapter 12 and Chapter 14 confirm that Ham Playing Fields and the Burnell Avenue site will bear the brunt of the scheme’s disruption. In Chapter 12, Tables 12.14 and 12.15 show HGV movements heavily concentrated between 2030 Q3 and 2032 Q4. Yet, the construction timeline implies earlier works may occur. There is no clarity on whether these movements

will begin before 2030 Q3.

Noise, vibration, and congestion impacts are covered only in generic terms. Chapter 14, Table 14.6 refers to vibration thresholds but does not specify when or how long these will be exceeded. This is particularly concerning considering the damage vibrations can have on the structural integrity of buildings of historical importance, residential buildings and business offices or shops. Chapter 12, Clauses 12.4.2.a and 12.4.2.c claim reductions in HGV impact, but no quantitative analysis is offered. There is little confidence that mitigation plans will be effective or enforceable.

Furthermore, transport and safety concerns around schools, especially Grey Court School, have not been fully addressed, and proof of engagement with the schools and parents has not been shared.

Chapter 12, Clause 12.5.67 restricts workforce travel assessments to Richmond, Kingston and Hounslow, excluding surrounding boroughs likely to be affected. Moreover, the Thames River Path and National Cycle Network may face extended diversions, yet staging plans to minimise impact are still being ‘explored’. Delayed mitigation measures and undefined commitments create a sense of uncertainty and erode community trust.

6. Alternatives Not Fully Explored

The PEIR fails to demonstrate that the TDRA is the best-value option. The WRSE Investment Model referenced in Chapter 3.4.8 suffers from limitations in spatial aggregation, as outlined in the 2022 Independent Review. The model's inability to reflect local environmental variation undermines the claim that TDRA offers the best return on investment.

Chapter 3 also references the consideration of smaller-scale abstractions (e.g. 50Ml/d), but fails to provide a detailed environmental comparison. Other options, such as improving the Beckton Desalination Plant, aquifer recharge, increasing smart metering, or leak reduction beyond Ofwat's baseline targets, are not sufficiently evaluated, particularly considering the impact they may have on the use of or need for the TDRA.

Even low-tech, distributed solutions such as greywater reuse, rainwater harvesting, and sustainable drainage systems are not meaningfully analysed. These could each offer significant water savings without the ecological and financial risks associated with the TDRA.

7. Governance, Delivery, and Financial Viability

Finally, there is substantial concern about the financial prudence of pursuing the TDRA. Estimates place capital expenditure between £359 million and £535 million, a figure that may increase due to delays, design changes, or unforeseen environmental compliance costs.

Thames Water's current financial instability raises legitimate questions about whether the company can deliver this complex infrastructure on time, on budget, and within legal limits. This is a particularly salient point considering the alternative, more cost-efficient programmes and projects that may be available.

Separately, Annex 5.3, Point A.1.8, assumes the project will run indefinitely, and therefore excludes decommissioning from consideration of the costs. This is not a responsible or future-conscious approach, especially for a scheme of this magnitude.

Conclusion

Taken together, the environmental risks, planning gaps, financial uncertainties, and weak

engagement practices demonstrate that the TDRA is not a viable project in its current form. Thames Water has not adequately justified the scheme as a best-value or environmentally sustainable solution to London's water needs.

It is the clear view of many local residents, environmental experts, and public representatives that the TDRA should be paused and reconsidered. Alternative water resource strategies should be explored fully and transparently, with stakeholder engagement conducted in good faith and with appropriate detail as well as independent scrutiny of Thames Water's work and planned work.

I urge Thames Water to return this project to the conceptual stage, conduct a more rigorous and inclusive consultation process, and prioritise lower-impact, more future-proof methods of ensuring water security.

Yours Sincerely,

A handwritten signature in black ink, reading "Sarah Olney". The signature is written in a cursive, flowing style.

Sarah Olney
Member of Parliament for Richmond Park