

DR BEN SPENCER MP
RUNNYMEDE AND WEYBRIDGE



HOUSE OF COMMONS

LONDON SW1A 0AA

Ms Sarah Bentley
CEO, Thames Water
Clearwater Court
Vastern Road
Reading
RG1 8DB

Our reference: BS23813

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Dear Ms Bentley,

I write in response to the Thames Water Draft Drainage and Waste Water Management Plan (DWMP) consultation. Issues regarding river and sewage flooding were among the first to be raised with me when elected to represent Runnymede and Weybridge in 2019, and I have had extensive discussions, correspondence and meetings with stakeholders, including Thames Water, in attempts to rectify the issues we face locally.

I welcome this draft plan as a step towards those solutions. The aims of protecting the environment, improving the health of our rivers, increasing resilience to the risk of flooding and generating wider community benefits are ones I wholeheartedly support. However, while the plan sets out analysis of the risks and costs, it provides little to no reassurance of actions that will be taken beyond the broad regional aims.

My constituency of Runnymede and Weybridge lies within the Chertsey STW catchment area in Surrey. It faces some of the greatest risks of sewer flooding and is greatly impacted by issues of water quality. Yet as currently framed there is no clear indication these risks will begin to be mitigated before 2035, which risks letting down residents and business who need assurance and clarity that action will be taken to reduce the risk they face. To have confidence in the DWMP there needs to be greater clarity on how these risks will be managed and prioritised.

Need for prioritisation of risk rather than regional approach

The DWMP sets out that the challenges for the Thames Valley (outside London) region, are:

- Groundwater infiltration due to chalk geology
- Misconnections of foul to surface water at property level
- Low density housing means external flooding is more prevalent than internal
- Very high sensitivity rivers



Due to this assessment, it states the asset strategy is to *'fundamentally tackle the inputs to the systems in this region. Our strategic intent for this asset base is to aggressively target unwanted flows (groundwater and surface water) in our 'foul only' sewerage system to restore headroom, by relining sewers to reduce groundwater infiltration, manhole sealing and replumbing surface water misconnections.'*

Yet Figure 5-7 (page 49), appears to show that less than 1% of funding within Surrey will be used for sewer lining to target infiltration hotspots, while only one of the 4 challenges are applicable to my constituency of Runnymede and Weybridge. I believe this highlights the difficulty, and near impossibility of developing a strategic management plan based on geographic area alone.

When reviewing the documents my focus is understandably on the plans for Surrey and the Chertsey STW catchment in particular. Within Surrey alone there are vast differences in geology, topography, risk profile and population density. With such a variety across Surrey, let alone the whole Thames Valley region, more clarity is needed about not only how risks are identified but how these will be prioritised. Currently the DWMP is a 25 year plan that does not set out how Thames Water will prioritise those areas in greatest need, beyond the broad regional level, nor envisage improvements being delivered in full until 2050.

With residents affected now, it is important that the plans shows clear milestones for improvements within the 25 year period, and sets out steps to address the most serious issues as a priority.

Water quality

It is of great concern that no river in Surrey is rated good for water quality and that all rivers in Runnymede and Weybridge are rated as either moderate or poor for water quality.

In terms of protecting our rivers, the DWMP states that if we don't act, modelling predicts that growth and climate change would impact on our storm overflow performance with 65% of L3 catchments having a spill rate >10 spills per annum per overflow to rivers including the Lower Thames, Wey, and Mole.

While all water quality is important, poor water quality in some rivers will have a greater impact on local communities. The DWMP highlights the risks relating to population growth and an increase in tourism across the region, which will place pressure on our sewer network. But does not appear to assess usage of waterways in a similar way when considering the impact of water quality. Where there is high recreational use of waterways, poor quality will have a significantly higher impact on public health and on businesses that facilitate this use.



As part of the planning for the DWMP, modelling should be done to map rivers by public usage, and potential impact on public health. I have not seen evidence of this work having been done and I believe this should be a serious consideration when prioritising which actions will have the greatest impact. Thames water should provide information regarding this endeavour, and affirm that areas of high river usage will be prioritised for works to improve water quality.

Sewer flooding

The DWMP identifies the wastewater catchments most at risk due to future pressures. Within this, the Chertsey area is specifically identified as at risk from sewage and surface water flooding.

Within the Surrey strategic plan, the DWMP also lists the current and projected hydraulic flooding risk (should not further preventative measures be taken), and frequency of overflows, for each catchment area. I have collated these into the table below, which clearly shows the greater level of risk faced by residents and businesses in the Chertsey STW catchment.

	internal hydraulic sewer flooding 1/30* currently	internal hydraulic sewer flooding 1/30* 2050	external hydraulic sewer flooding 1/30* currently	external hydraulic sewer flooding 1/30** 2050	hydraulic sewer flooding 1/50** currently	hydraulic sewer flooding 1/50** 2050	Overflows
Chertsey <i>percentage (number of properties affected)</i>	4.1% (1482)	5.9% (2116)	4.1% (1466)	5.9% (2100)	9.9% (2538)	14.2 (5075)	The only overflow in this area currently spilt 61 times in 2020
Lightwater	4.4% (372)	5.8% (489)	4.3% (368)	5.1% (431)	10.3% (870)	12.4% (1039)	The only overflow in this area currently spilt 12 times in 2020
Woking	0.4% (135)	1.3% (411)	0.9% (277)	2.4% (789)	1.6% (525)	4.3% (1408)	The only overflow in this area currently spilt 23 times in 2020



Chobham	0.5% (26)	1.3% (63)	2.6% (131)	4.7% (233)	4.0% (201)	7.4% (368)	The only overflow in this area currently spilt 98 times in 2020
Dorking	0.8% (94)	1.1% (132)	1.4% (169)	2.2% (266)	(2.6% (325)	3.7% (452)	The seven overflows in this area spilt 206 times in 2020
Leatherhead	0.7% (139)	1.5% (313)	2.5% (502)	3.4% (695)	3.8% (780)	5.6% (1151)	The three overflows in this area spilt 84 times in 2020
* Risk up to a 1 in 30 year storm (3.3% chance per year); ** Risk up to a 1 in 50 year storm (2% chance per year).							

Chertsey catchment has almost twice as many properties at risk from internal sewage flooding (1482) as the rest of Surrey combined (766).

The Chertsey catchment also has a level of risk to external sewage flooding (1466) greater than that of the rest of Surrey combined (1447).

I absolutely welcome the aims of the plan to:

- Reduce the numbers of customers at risk of internal and external hydraulic sewer flooding in a 1 in 50 year storm by 100% ;
- Reduce spills (where overflows are present) to <10 in a typical year; and
- Maintain 100% STW permit compliance

However, I am concerned that the plan does not set out steps to mitigate this risk until the latter stages, currently scheduled for 2035-2050.

The Surrey Strategic Plan states that the short term plan (2025-30) is to increase the confidence in plans for long-term investment to reduce the risk of internal and external hydraulic sewer flooding and enable catchment-level planning of surface water management solutions

Medium term (2030-35) plans are to further develop our catchment-level planning to reduce the risk of sewer flooding by removing rainfall runoff that is entering our system.



It is not until 2035 at the earliest that work would begin to reduce the risk of hydraulic sewer flooding by removing rainfall runoff into our systems through the catchment-wide planning and implementation of surface water management solutions, and by provide sewer network enhancements to meet growth and climate change drivers.

Given the impact sewage flooding is already having in the Chertsey catchment area, I do not believe a wait of 10 years into the new plan can be justified before work commences to reduce the current risk faced.

I know Thames Water and its partners are committed to bringing about improvements, and I am sure there must be work ongoing not included in this summary time line to help address the issues I have repeatedly been raising on behalf of constituents. Suggestions that the priority for the first 5 years would be to 'increase the confidence in plans for long term investment' are likely to lead to accusations of lack of action, or concern these issues are not being addressed swiftly or adequately.

I note this consultation is on the detail set out in the DWMP, and that plans for more localised areas within the Thames Valley region are still in development. However given the summaries are published as part of the DWMP, I would welcome further detail regarding these plans and what measures could be implemented in the short and medium term.

Partnership working

I welcome the commitment to partnership working and agree this is vital to achieve maximum impact. However from my experience of issues around addressing sewage flooding in particular, the best outcomes can only be achieved when there are clear roles and responsibilities set out. I would therefore welcome a commitment to this being published as part of any project for joint ventures.

The DWMP also sets out a commitment to stakeholder engagement which I also welcome. I note the Surrey catchment strategic plan makes two references to the Addlestone Bourne catchment flood alleviation scheme as a joint project between Thames Water and the Environment Agency. As the Addlestone Bourne runs through my constituency I was surprised I have received no communication regarding this project despite regular and recent communication with both organisations, and there appears no public information available. I wonder if this refers to the work being undertaken by the River Thames Scheme (RTS). I would be grateful if further details and confirmation if it falls within the scope of RTS, or if a separate project, further details and how it may affect Runnymede and Weybridge.

I would also welcome further information of how plans between catchment areas interact, and what co-operation exists between areas. Plans for Mogden catchment area risk zone 7 also affect Runnymede and Weybridge as it includes the areas across the River Thames, and areas that manage sewage treatment and discharges in areas upstream of our rivers also have a direct impact on water quality. Is there a mechanism for measuring the cumulative impact of action taken by each catchment area on the waterways they affect?



Infrastructure

The DWMP also notes plans for improvement works to 4 sewage treatment facilities in Surrey, however this does not include those in or near Runnymede and Weybridge. During the past year I have visited our recent facilities and have been informed of the need for improvements and upgrades. I of course hope that the omittance of these works in the 2025-50 plan is on the basis they are hoped to have been completed before this, but would be grateful for confirmation this is the case.

Summary

It is important that the final plan balances the needs across Surrey, but also addresses the most high risk areas now. It must be affordable, deliverable and achieve outcomes that will deliver maximum benefit for residents, businesses and the environment. These factors need to be considered at each stage of the plan, and not only what meets these aims by the end of the 25 year period.

We need to be able to deliver improvements for those most affected in at least the medium term. Failure to do so will leave residents and businesses struggling with unacceptable regular and repeated issues of sewage flooding in particular. I have raised a number of questions and considerations in this consultation response. I look forward to receiving a response and would welcome the opportunity to meet with you to discuss these and how we can ensure swifter action is taken in response to the areas facing highest risk of flooding, and highest impact from poor water quality.

Yours sincerely,

Ben Spencer

Dr Ben Spencer MP
Runnymede and Weybridge