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NPS For Water Resources Consultation Response-Letter Before Action-20th December 2017-BY EMAIL

The UK Government is failing to look after our water resources in a holistic and integrated way. If the UK Government does not change course, legal proceedings will be issued against it, at the earliest opportunity.

The draft NPS for Water Resources is yet a further example of why we will continue to fail to meet UK and European water environmental legal standards thereby putting at further risk, water quality, water resources, biodiversity, climate mitigation, resilience and continue to increase the risks of, flooding, pollution, drought and heat island effects across our river basins.

TBGE, objects to the draft NPS for Water Resources, in its entirety.

We ask that this consultation is halted The NPS for Water Resources does not address water problems as a whole and ignores key factors such as the failure of Thames Water (TW) to stop 24% of the water entering its mains from leaking out. Desalination is the most expensive way of providing drinking water, using disproportionate amounts of electricity. This questions the need for water transfer and desalination plants in the first place.

TBGE also objects to the NPS for Waste Water which needs to be withdrawn so that a holistic and integrated water policy that covers all aspects of water management can be consulted upon instead including compliance with UN Sustainability Goals for water.

Consequently, the preparation works of the Thames Tideway Tunnel has to be halted. The financial and water mismanagement of Thames Water Limited, as extensively written about in the Financial Times, The Times and other newspapers, needs to be investigated by Government immediately. See Appendix 1.. The Government must review the whole way that TW manages water and treats water customers.

Under equitable principles, billions of pounds of dividends paid to previous shareholders of Thames Water Ltd, who knew that Thames Water was in huge debt, ought to be clawed back by the UK Government. The UK Government has allowed Macquarie Bank to defraud the British public and water rate payers and as a result could be committing conspiracy to defraud. In addition, it would appear that Thames Water is in breach of the SIP Regulations by effectively undertaking the construction of the TTT.

A much needed comparative cost benefit analysis has to be undertaken of best available technologies known as Integrated Water Resource Management (IWRM) for London and the rest of the UK's water basins. This has never been done. There is no place in UK water policy for an out of date carbon intensive TTT, water transfer and desalination plants when sustainable, better alternatives exist. Alternative measures would save bill payers billions of pounds and actually improve the water and rest of the environment as TBGE experts Professor Colin Green (Appendix 2) and Professor Richard Ashley (Appendix 3) assert.

Work undertaken by John Duder, TBGE expert, shows that water quality in the Upper Reaches of the Thames and the Thames River Basin as a whole, is not improving but appears to be deteriorating. Data compiled by the EA shows that water quality targets under the Water Framework Directive (WFD) and sewage pollution controls under the Urban Waste Water Treatment Directive are not being met and unlikely to be met under current approaches.

Finally, the new policy water sought must comply with the Aarhus Convention by ensuring full public participation at the earliest stage of the planning process and by permitting considerations of need, options and alternatives during the determination of any water related proposal.

Yours sincerely Emily Shirley