



From Lord Berkeley  
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Rory Stewart MP  
Parliamentary Under Secretary of State  
DEFRA

23<sup>rd</sup> November 2015

Dear Rory,

**Thames Tideway modelling – apply to the EC for end to Infraction.**

Recent investigations by Prof Chris Binnie have provided further evidence that the spill frequencies from CSOs, the main criteria for meeting the EU Waste Water Treatment Directive, will be met once the Lee Tunnel is operational. The justification for the Thames Tideway Tunnel (TTT) is based on evidence from Thames Water's Sewer Hydraulic Model. OFWAT has found this to be so inaccurate and unreliable that it has 'fined' TW £ 86m in 2014. <http://www.bbc.co.uk/news/business-27710187>. Binnie demonstrates that the actual levels of dissolved oxygen at the various Automatic Quality Measuring Stations in the Tideway bear very little resemblance to those used in the Model.

This renders the Cost Benefit Analysis on which the TTT is based equally suspect.

Interestingly, TW appears to have started diverting sewage into the Thames before an expected storm, causing much worse conditions there for almost no reduction in house flooding. Presumably they hope that this will support their case that the Thames is desperately in need of cleaning up by building the Tunnel. They should be instructed to revert to the previous regime.

This report is further evidence that the water quality modelling is not robust. In addition, Binnie demonstrates that all the other criteria for meeting the UWWTD and the Water Framework Directive are likely to be met.

So why does not the Government apply to the European Commission to have the infraction proceedings set aside, rather than proceed with an unnecessary £4bn expenditure on the Thames Tideway Tunnel? I look forward to hearing from you.

A handwritten signature in black ink, appearing to read 'Tony Berkeley', written over a horizontal line.

Tony Berkeley

Attached: Prof Binnie's paper 'Thames Tideway, comparison of the models with field data' dated 22 November 2015.