### Thames Water - "We're upgrading Slough Sewage Treatment Works" – by digging up Dorney Common.

Around 100 years ago, Slough Borough Council rented and then compulsory purchased Manor Farm, Dorney in order to build a sewage treatment works. The Treatment Works has created quite a stink in Dorney for many years – especially in the early days when the raw sewage was spread over the fields behind Manor Farm!

In the 1920s Slough needed a new sewage works because the population was growing – especially due to the amount of new labour required to convert the "Big Dump" of World War One rusting vehicles into the Slough Trading Estate.

The ever-increasing population of Slough now needs to both increase the capacity of the site and improve the quality of water that currently outfalls into Roundmoor Ditch.



The recent letter some Dorney residents received from Thames Water advises that laying an underground 2km tunnel of steel pipes from the current Sewage Works outfall to the Thames – under the Jubilee River, Dorney Common and agricultural land in Boveney – was selected as *"it offered the best outcomes and the lowest impact within the timescales required for these works"*.

This is despite the fact that the distance between the Sewage Works outfall is but a few feet from the Jubilee River ("an integral part of the River Thames" according to the National Rivers Authority at the Public Inquiry in 1992) and connecting the outfall to the Jubilee River could be achieved with a very short length of piping and no pumping station!

In the four-page document on the Thames Water website, they attempt to explain the rationale for this in "Why aren't you taking the new outfall directly into the Jubilee River?".

https://www.thameswater.co.uk/media-library/home/about-us/investing-in-our-region/Improvementsin-your-area/slough-sewage-treatment-works-information-pack.pdf

Thames Water makes the following statements on Page 2 [our emphasis]:

"The Jubilee River is a flood alleviation scheme and there are significant protections in place to protect the local community from flooding. Constructing a new outfall to it would **require changes to the planning permission for the Jubilee River**. The **licences, legal obligations, and the procedures under which the Jubilee River operates** would all need to be extensively reviewed and potentially amended to accommodate a new outfall.

We have analysed the **indicative water quality requirements** for a new discharge to the Jubilee River and have determined that these are unlikely to be technically

achievable with respect to current wastewater treatment technology.

These challenges have led us to conclude that **there is no real prospect of having an implemented solution within the timescales** required for these works."

Dorney Parish News have put the following questions to both Thames Water and the Environment Agency :

- What are the full details of the "changes to the planning permission" that are required?
- What are the full details of the potential amendments that might be required to the "licences, legal obligations, and the procedures under which the Jubilee River operates"?
- What are the "water quality requirements" for any new discharge to the Jubilee River?
- What are the precise reasons that lead you [Thames Water] to believe that "there is no real prospect of having an implemented solution within the timescales required"?

Only when detailed answers are provided to these questions will residents be able to determine whether Thames Water should dig a huge trench across Dorney Common, bring masses of equipment down Lake End Road, Village Road and Common Road, use tonnes of carbon through the manufacture of steel pipes, diesel and earth disturbance for a two year period and build a pumping station that could go wrong which would probably result in more of a stink over Dorney and Eton Wick. All at a projected cost of around £20 million of residents' Water Rates money.

The simple, alternative option is to use the Jubilee River.

We await the answers to the questions we have put to the Environment Agency and Thames Water to determine whether their rationale is legally correct or if it has a closer relationship to the stuff that goes into Slough Treatment Works!

Some residents thought that, having gone through the turmoil of the construction of Dorney Lake, the Jubilee River and the M4 widening, Dorney might be left alone for a time. Not at all – here comes yet more disruptive construction in the parish unless we, or the courts, can ensure that the EA and Thames Water juggernauts can be stopped.

#### Peter Bowman and Bill Dax

# Thames Water: 2,000m trench across Dorney Common and Boveney or 30m pipe to the Jubilee River?

Further to last month's article on the planned 2,000 metre pipeline trench across Dorney Common and Boveney fields into the Thames rather than a short, inexpensive 30 metre pipe into the Jubilee River, Dorney Parish News has received further information on this from Thames Water.

Their response may be summarised as follows:

- Thames Water confirm that they have not taken any steps to date to discuss the planning issues in detail with the planning authority.
- Despite the above, Thames Water are making assumptions about the planning permission relating to the Jubilee River without discussions with the planning authority. These assumptions could very well be incorrect.
- Nobody at Thames Water appears to have taken the time to read the 340 pages of the 1992 Public Inquiry report. DPN has, and the report does not support any of their responses.
- Thames Water also confirm that they haven't had any meaningful discussions with the EA regarding potential amendments to the licences (if any), legal obligations (if any) and the operating procedures regarding the Jubilee River. Again, let me help you on this matter. DPN has carefully read a 2005 copy of the Jubilee River operating procedures, which have been updated since then, and there is no reference to a potential minimal outflow of just over 1 cumec from the Slough Treatment Works outfall causing any problems to their procedures whatsoever.
- As Thames Water have not yet had any meaningful discussions with the planning authorities or the Environment Agency it is very possible that their assumptions regarding the Jubilee River's water quality and flooding could be completely wrong.



We understand that an Environmental Impact Assessment has been conducted on the 2km trench and we have requested a copy. It appears that this impact study doesn't include an assessment of the amount of additional greenhouse gas emissions are associated with this project.

We understand that simply constructing a 2km steel pipe would create around 1,000 tonnes of GHG (greenhouse gases) and the digging of the trench a further 1500 tonnes, so a total of around 2,500 tonnes. This is the amount generated in a year by 500 average homes – nearly twice as much as all of Dorney's houses in a year!

We have asked more questions and are waiting for the answers. We are not at all impressed with the answers we have received to date!

### Peter Bowman and Bill Dax

#### Incompetence, mismanagement and deliberate obfuscation by Thames Water?

Recent Freedom of Information requests to Thames Water and the Environment Agency regarding the bizarre plan to create a 1.7km outfall of treated water from the Slough Sewage Works to the main Thames River rather than using the part of the Thames River (a.k.a. the Jubilee River) next to the current Sewage Works outlet appear to indicate gross incompetence, mismanagement and deliberate obfuscation by Thames Water on this issue.

When asked by DPN for *"full details of the changes to the planning permission"* required to enable the nearest part of the Thames (a.k.a. The Jubilee River) to be used, Thames Water replied *"we've not determined the full details to the changes to the planning permission that would be required"* and *"It was concluded that a new discharge to the Jubilee River had no real prospect of being delivered within the timeframe required to meet our regulatory commitment of March 2025. As such a detailed review of the changes to the planning permission for the Jubilee River wasn't considered necessary."* The Environment Agency responded that *"we haven't assessed what these are"*. There appears to be nothing stated in the 340 pages of the 1993 Planning Inquiry that would prevent such planning permission being given. The reason for these responses appears to be that nobody in Thames Water has sought to establish what planning permissions might be required or the time that they might take.

When asked by DPN for "the full details of the potential amendments to the licences, legal obligations and the procedures which the Jubilee River operates", Thames Water replied, "We haven't determined the full details of the potential amendments to the licences, legal obligations and the procedures which the Jubilee River operates". The Environment Agency responded that they hadn't been asked by Thames Water.

When asked by DPN "what are the water quality requirements for any new discharge to the Jubilee River?", Thames Water replied, "these would need to be determined through further detailed studies and investigations". The Environment Agency replied, "It is a recommendation of this work that, if the Jubilee River did become a serious candidate for discharge [from Slough Sewage Works] more accurate flow gauging and water quality sampling would be required". It appears that Thames Water decided not to examine more accurate flow gauging and water quality sampling processes.

Thames Water asked environmental consultants, Jacobs, to provide a report in order to support a request for an Environmental Impact Assessment Screening Opinion from the local planning authorities, Buckinghamshire Council (South Bucks Area) and Slough Borough Council, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the proposed upgrade to the Slough Sewage Treatment Works and the associated new outfall to the River Thames. Jacobs has carried out an assessment of the scheme on behalf of Thames Water Utilities Limited (TWUL) and prepared the report to enable Buckinghamshire Council (South Bucks Area) and Slough Borough Council to provide a formal Screening Opinion of the scheme.

This comprehensive 233 page report (October 2021) included, as Appendix L, Outfall Option Route Plans. These, apparently, included the following options:

- Route 1 Romney Lock discharge point (Lock-Southern Gravity Route)
- Route 2 Romney Lock discharge point (Lock-Northern Gravity Route)
- Route 3 Boveney Lock discharge point
- Route 4 Jubilee River Discharge point
- Route 5 Roundmoor Ditch

Unfortunately for those of us examining the apparent lack of justification of the proposed scheme, the Appendix page was blank except for the heading! Possibly redacted to avoid difficult questions?

The brief comment in the Executive Summary of this report stated: *"Route 3 was considered the preferred route as it ensures compliance by discharging to the River Thames and it is the shortest route diverting flow to the River Thames with the least interaction with stakeholders, infrastructure, and natural features."* 

Clearly, this conclusion would more accurately apply to Route 4 - discharging to the part of the River Thames closest to Slough Sewage Works – the so-called Jubilee River!

The National Rivers Authority (now the Environment Agency) stated at the 1993 Planning Inquiry, regarding water quality, that "the new Flood Relief Channel [Jubilee River] would be a controlled water and **an integral part of the Thames and the NRA would apply the same objectives to it as apply to the River Thames in the same area**." Page 36 Item 2.185.

The inevitable conclusion that one is forced to reach from the above facts is that there is no need whatsoever for the 1.7km pipe for treated water from Slough Sewage Works to the main part of the River Thames. A 30m pipe into the part of the Thames closest to Slough Sewage Works [a.k.a. The Jubilee River] would be quite adequate, considerably cheaper, less disruptive to the communities of Dorney and Eton Wick and would release significantly less carbon into the atmosphere during construction.

Please start again, Thames Water – and apply some common sense and professionalism to the problem. Surely that's not too much to ask?

## Peter Bowman and Bill Dax