

Professor Richard Ashley

Received by email

I would like to make the following points as part of this consultation:

1. the consultation process is frankly pathetic. Even Defra manage to make their consultations accessible and comprising online formats. A consultation requiring an email or a letter response in this day and age is naive and only one that it is tempting to believe is a deliberate attempt to avoid serious responses.

2. As I shall be seeing Cathryn Ross on 11th February I shall be making my point personally to her.

3. Does Ofwat have even the slightest idea what 'sustainable development' is? I note that Ofwat has some idea what resilience is, despite various consultant reports not having much idea at all. I presume that is why Ofwat's sustainability duty has been downgraded, following several unsuccessful attempts for Ofwat to get to grips with it.

I have an international prize for my research on sustainable water asset management, so do have some idea what I am talking about.

The table on p16 'how our work aligns with Government Priorities' betrays Ofwat's ignorance of sustainable development:

'Thames Tideway' is not - assuming you mean the Thames Tideway Tunnel - by even the remotest understanding 'contributing to sustainable development objectives'

Yes, I know that UK Govt has a very narrow definition of this:

- "1. Social progress that recognises the needs of everyone
2. Effective protection of the environment
3. The prudent use of natural resources
4. The maintenance of high and stable levels of economic growth and employment."

The tunnel fails in each regard especially when compared with the alternative using blue-green infrastructure (BGI):

for 1. BGI provides a host of benefits over and above simply reducing CSO spills into the river and even helps address flooding - none of which the tunnel does. These multiple benefits are manifold (and I won't bother you with listing them as you know already) and accrue to the whole of society, not only one company and it's owners.

for 2. How on earth can an energy guzzling, carbon embodying, greenhouse gas emitter possibly be considered as 'protecting the environment'? In any case Prof Binnie's review report tells us that the Thames complies with the Urban Wastewater Treatment Directive now we have the Lee tunnel.

3. So, we are going to use thousands of tonnes of concrete and steel plus other materials to build a tunnel, where we could instead have BGI that uses hardly any natural resources and in fact increases the stock of natural capital (please read the committee on climate change's 3rd report as you clearly have not noticed it)

4. Philadelphia has shown that BGI brings more jobs, more economic growth, both of which are sustained; unlike the tunnel which brings a bulge in transient jobs - and please tell me how it brings economic growth? Maybe to Thames Water and it's owners (outside the UK)

I would be pleased to provide you with more information about these matters, but I know that you already know all of this but choose to ignore it.