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**Place Division, Chief Executives Directorate  
DEVELOPMENT MANAGEMENT**

Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ  
website: [www.richmond.gov.uk](http://www.richmond.gov.uk)

Our ref: TP.N/CT/TDRA\_EIA

Your Ref: WA010006

Dial: 020 8891 7300  
Contact: Chris Tankard

The Planning Inspectorate  
Environmental Services Operations Group 3  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

6 November 2024

SENT BY EMAIL: [Teddingtondra@planninginspectorate.gov.uk](mailto:Teddingtondra@planninginspectorate.gov.uk)

Dear Sir/Madam,

**PINS REF No: WA010006 Teddington Direct River Abstraction (TDRA)**

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 – Scoping Opinion Consultation**

**PROPOSAL: Application by Thames Water Utilities Limited for an Order granting Development Consent for the Teddington Direct River Abstraction Project**

I write in response to the statutory consultation correspondence dated 11 October 2024 carried out in relation to the Environmental Impact Assessment Scoping Report (SR) concerning the above development proposal. Although a major part of this proposal would be located within the London Borough of Richmond upon Thames, it has been classed as a Nationally Significant Infrastructure Project and would therefore require a Development Consent Order to be determined by the Planning Inspectorate on behalf of the Secretary of State. This letter therefore constitutes the London Borough of Richmond upon Thames Council's response to the Environmental Impact Assessment Scoping Report consultation issued by the Planning Inspectorate.

The Scoping Report sets out the following environmental aspects as being scoped into the EIA:

- Air Quality

- Noise and Vibration
- Historic Environment
- Terrestrial Ecology
- Aquatic Ecology
- Ground Conditions and Contaminated Land
- Townscape and Visual Amenity
- Water Resources and Flood Risk
- Human Health
- Carbon and Climate Change
- Socioeconomic, Community, Access and Recreation Health
- Waste and Materials
- Traffic and Transport
- Cumulative Effects

It is noted that Major Accidents and Disasters have been scoped out in full. This Council does not consider it possible at this stage to scope all items from this chapter out on the basis that either existing legislation or project design will ensure appropriate risk reduction and mitigation. Thames Water has not identified what legislation and/or design measure provides what type and level of reduction or mitigation of environmental impact and as a consequence this section cannot be assessed for accuracy. On this ground the London Borough of Richmond upon Thames requests that the Major Accidents and Disaster chapter is 'Scoped In'.

Otherwise, the Council considers that the environmental aspects identified for inclusion within the EIA are appropriate subject to the general and specific comments made on the scope of the EIA in the attached table being addressed. It should be noted that these comments have, in some instances, requests for 'Scoping In' some of the specific environmental aspects identified as being scoped out in the individual chapters 'Summary of Scope for the EIA'.

### Conclusion

The London Borough of Richmond upon Thames consider that in general terms the Scoping Report meets the statutory requirements for scoping set out in the EIA Regulations. The scope of the EIA is considered to be adequate subject to the inclusion of a Major Accidents and Disasters chapter and the comments/concerns/omissions set out in the attached table being taken into account by The Planning Inspectorate as part of the process before adopting its Scoping Opinion.


We expect that ongoing detailed discussions with Thames Water will continue whilst the EIA is undertaken, and as environmental implications come to light. This is especially relevant as proposals are developed and amended through the pre-application and consultation process.

The Council would formally request that receipt of this response is confirmed by The Planning Inspectorate. The following email addresses should be used as primary points of contact for further correspondence to ensure that the Development Management Team is reached directly:

[dctechnicalsupporthub@richmondandwandsworth.gov.uk](mailto:dctechnicalsupporthub@richmondandwandsworth.gov.uk)  
[robert.angus@richmondandwandsworth.gov.uk](mailto:robert.angus@richmondandwandsworth.gov.uk)

The statutory consultee response is provided without prejudice to any actions the Council may take as landowner should the need arise.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Angus', is written on a light-colored background.

**Robert Angus**  
**Head of Development Management**  
**London Borough of Richmond upon Thames**