

London Borough of Richmond upon Thames Comments 6 November 2024
Teddington Direct River Abstraction Project
EIA Scoping Report (J698-AJ-C03X-TEDD-RP-EN-100007)
<b>Chapter 1: Introduction</b>
<p><u>Paragraph 1.1.5</u> - <b>AMEND SCOPING BOUNDARY</b> - EIA scoping Boundary does not include Hawker Centre and Park gate Playground both of which would be impacted by the project.</p> <p><u>Paragraph 1.4.1</u> - <b>CLARIFICATION</b> - Saying TW has a desalination plant that can supplement supplies at times of high demand is misleading. We understand it has worked 3 times in the last 12 years</p>
<b>Chapter 2: The Project</b>
<p><u>Paragraph 2.2.13 – 2.2.14</u> - <b>OMISSION METHODOLOGY</b> - To assess human and environmental risk, the EIA should <b>SCOPE IN</b> a requirement to provide evidence (including data) on the efficacy of the Mogden Tertiary Treatment Process (TTP) in reducing chemical and biological hazards in the wastewater intended for the TDRA. The evidence should also include how the Mogden TTP compares in terms of efficacy to tertiary treatment processes in operation elsewhere in the UK</p> <p><u>Paragraph 2.2.31</u> - <b>OMISSION</b> - the Intake description does not describe the permanent change in the towpath at this area arising from construction on top of the lower towpath. Also, it cannot be stated that the abstraction plant being 150 metre upstream of the treated sewage outfall “ensures no risk of recirculation” This is not proven.</p> <p><u>Paragraph 2.2.39</u> – <b>CORRECTION FACTUAL ERRORS</b> - the proposed working hours of 7a.m. to 7p.m are not standard. The normal permitted hours in LBRuT are 8am - 6pm, Mon – Fri. 8am – 1pm Saturdays and no work on Sundays or bank holidays or days of public mourning without prior consent.</p> <p><u>Paragraph 2.2.40</u> – <b>OMISSION</b> - Anticipated number of workers at Burnell = 100 and Ham Street = 50 – Ham will struggle to accommodate the likely car parking in both areas – a parking survey is required.</p> <p><b>COMMENT</b> - Use of Ham Street for car parking will have a knock-on affect to Ham House’s parking and accessibility therefore potentially their income – needs to be included in Socio-economic chapter: construction phase impacts</p> <p><u>Paragraph 2.3.10</u> - <b>CLARIFICATION</b> - “telemetry notification of quality issues” - meaning of this terminology should be better explained</p> <p><u>Paragraph 2.4.20</u> - <b>OMISSION METHODOLOGY</b> - the mention of routing of traffic along Dysart, Burnell and Beaufort in a possible “gyratory manner”; this is not subsequently mentioned as an issue to be scoped even though it would clearly impact residents on those roads. This should be included within the scoping - <b>SCOPE IN</b>.</p>

### Chapter 3: Design Evolution

Paragraph 3.1.1 - OMISSION THEME, **SCOPE IN ALTERNATIVES** - Planning Inspectorate's Advice Note 7 requires the environmental impact assessment (EIA) Scoping Report to outline the reasonable alternatives considered and the reasons for selecting the preferred option.”.

OMISSION - Thames Water do not describe the alternatives in this scoping document, nor the decision-making process that resulted in the selection of the option. They merely describe their own assessment and changes within the design of the actual TDRA proposal which is not in line with the advice note's requirements.

Note - This Council has advised TW's consultants in pre-app meetings with the combined LPAs of the need to look at alternatives to the Teddington Direct River Abstraction scheme. Specifically, this should review the potential of using the Queen Mary Reservoir near Shepperton which was the largest reservoir in the world when it was opened by King George V in June 1925. This has been largely absent in presentations at meetings and should be included in the EIA scoping report.

Paragraph 3.2.7 - OMISSION **SCOPE IN** - does the modification of the storm tanks mean capacity at Mogden is reduced. If so the impacts / implications of this need to be Scoped In.

### Chapter 4: Consultation and Engagement

Paragraph 4.3.1 - OMISSION FACTUAL ERRORS - the Draft Water Resource Management Plan 2024 consultation; “The draft Water Resource Management Plan 2024 (dWRMP24) was consulted on from 13 December 2022 to 21 March 2023, seeking feedback from customers, stakeholders and regulators on the proposals. This included identifying the Project as a best value option within the plan”

Note - This consultation concerned the overall plan and not individual options like the TDRA. There was very little “locally specific information” made available to the public directly affected by the scheme at the draft WRMP24 consultations. The public was not given the right information on which a valid choice could be made.

Paragraph 4.4.1 – the Non-Statutory Public Consultation in 2023; Thames Water describe this consultation as “to seek feedback about the site options appraisal for shafts and infrastructure associated with the Project, as well as feedback on the conveyance route alignment”.

Note – CORRECTION/CLARIFICATION - This description is incorrect. The 2023 consultation was clearly referenced as a “site options” consultation; the public were specifically asked to give an opinion on the “use of” the identified sites and not any other aspect of the project. In fact, at P502 20.2.1 of the scoping report Thames Water states “the focus of this engagement was on site options”. There was no encouragement or guidance to give an opinion on the conveyance route nor on the other infrastructures. There was not sufficient information given for people to give an informed opinion on the topics that are proposed for scoping in this document. Despite this Thames Water refers to the ‘Consultation and Engagement’ in every topic chapter – usually by way of an introductory “in relation to ...” phrase. (For example; Paragraph 6.2.1 “In relation to air quality the responses tended to be general, relaying potential concerns about dust pollution during construction and odours during operation.”). Given the consultation documentation contained little or no information on many of the EIA

topics and did not invite opinion on the EIA topics Thames Water should be asked to present the results of the non-statutory consultation in a more accurate manner.

### **Chapter 5: EIA Methodology**

No comments

### **Chapter 6: Air Quality**

General note – some of the key concerns for air quality are over site deliveries and spoil removal, especially if this is by road and the impact of additional traffic on the boroughs air quality which needs to take into account road conditions on event days at the Allianz Stadium, Twickenham Stoop and the Great River Race as well as non-event days. Richmond have worked hard to achieve the UK objectives and are currently consulting on a new AQAP where we have set ambitious targets in line with the World Health Organization especially for NO2.

The material provided for Air Quality in the EIA Scoping Report and Appendix C – Air Quality Monitoring Data, is acceptable. Some of the cross referencing to other chapters or Figures in 6.02 Environment Statement – Air Quality, is very difficult/impossible to locate. This needs CLARIFICATION.

Whilst the whole of the borough is an AQMA, the sites in Ham and Teddington near/next to the River Thames, are generally areas where levels of pollutant comply with UK annual limit values for NO2 and PM10.

Our main concern will be during the construction phase for:

1. Dust for nearby receptors/school children/residents
2. The number, route and timing of HGV vehicles related to this project through the borough, especially near sensitive receptors such as schools or through Twickenham town centre, an AQFA, and crowds attending events at Allianz Stadium and Twickenham Stoop. The Council has spent many years trying to reduce levels of pollutant in Twickenham town centre to compliance levels which it has now achieved. No development should be permitted to undo this work. The whole of LBRuT is an AQMA, Twickenham town centre is an AQFA, cumulative impacts from HGV's will require tailored modelling. Details below:

Changes in traffic along a road or route which would trigger one or more of the screening criteria described below are modelled:

- b. An increase in heavy duty vehicle or plant movements (expressed as an AADT) by 100 or more per day, or 25 or more per day within or adjacent to an AQMA.

Proposed additional HGV's total 85 AADT. This is significant. Modelling must be tailored. LBRuT has serious concerns for any additional HGV's, especially above 25 AADT added to the existing road network along the proposed route due to cumulative effects on emissions from construction vehicles from other development sites nearby. These sites result in queueing/stop/start motoring. Emissions from slow moving (5-10kph) HGV's are accepted to be significantly higher than HGV's moving at 35kph or more. Any additional HGV added to already queueing traffic is likely to raise levels of pollution and should be avoided/mitigated. This is particularly relevant at this section of the A316 (on event and non-event days at Allianz Stadium and Twickenham Stoop) plus also in and around Twickenham

town centre. Cumulative impacts are likely to occur from various developments including Richmond College phase 4 housing development off A316, TfL roadworks on A316 at London Rd junction (commenced 21/10/24), Twickenham Riverside development (town centre), Arragon Rd redevelopment, and The Lensbury Club redevelopment. Any modelling must take account of queuing/very slow moving traffic for 8-10 hours per day and adjust for very low speeds. Speeds of 20kph will not be acceptable. Locations and modelling input criteria should be agreed with the LPA.

Ideally, mitigation will include the river as an alternative means of transport. LBRUT encourage the applicant to use the River Thames to remove excavated/waste material and reduce the need for HGV road transport at the Teddington Lock outfall and Ham intermediate construction shaft.

This is sign posted in Chapter 18 Transport, paragraph 18.6.4 – The document says that further consideration will be given for the use of water to transport materials, waste and equipment as the design develops. This option must be fully explored with the PLA, especially for “hazardous/large loads” and processes similar to the TIDEWAY project deployed, on various grounds including air quality, noise and highways.

Table 6.1 – CORRECTION (in red type) - The LBR Supplementary Planning Document on Air Quality (2020)

Table 6.1 – CORRECTION (in red type) - The LBR Local Plan 2015-2018 and the LBR ‘Pre-Publication’ Draft (Regulation 19) Local Plan (20243)

Table 6.3 – OMISSION, **SCOPE IN** – 2<sup>nd</sup> Column Include Haliburton Road, Talbot Road, Heron Road, Newry Road, Worple Avenue, Beaufort Close and Beaufort Road, Broom Water West, Broom Water, River Reach, Trowlock Island

OMISSION, **SCOPE IN** – 3<sup>rd</sup> Column Include St Stephens Junior School, Chase Bridge Junior School, Lensbury Club, West Middlesex Hospital, Worple Primary

Paragraph 6.4.12 – OMISSION METHODOLOGY - The Ultra Low Emission Zone extension came into force in 2023 and includes Twickenham, Hounslow and Kingston, this should be referenced within this paragraph – the baseline data should be set from 1 Sept 2023 as opposed to 2022 in this regard

Paragraph 6.4.13 – OMISSION METHODOLOGY – Thames Water state “on the basis of the extensive air quality data coverage in the study area and expected reduction in baseline concentrations, no additional baseline monitoring is proposed to support the ES”. Note - There are many monitoring sites in and around the Mogden area. There are no monitoring points for air quality close to Ham Lands, Burnell or Broom Water. The closest is near Tudor Drive fire-station; The nearest air monitors to Ham car park are across the river in Twickenham. Given the difference in the type of traffic and air quality situation between, for example the Richmond Road (fire-station monitor) and Burnell Avenue (no monitor), how the baseline is set without that kind of data should be explained. This is especially important if the significance of any impact is based on a “relative change to existing” basis.

Paragraph 6.5.1 – OMISSION **SCOPE IN** - In line with LP10 (and Policy 53 from the emerging Local Plan) care homes should be considered as sensitive receptors and Scoped In as there are some in close proximity to the Twickenham and Ham boundary

Paragraph 6.5.2 – OMISSION METHODOLOGY **SCOPE IN** - The chart of “sensitive air quality receptors”: Note - the list is suggested to be provisional but has some clear omissions of locations that will undoubtedly be affected, for example Beaufort Avenue and Dysart Avenue, Biggin Hill, Northweald Lane. The list of properties under the sensitive air quality heading needs to be updated.

## **Chapter 7: Noise and Vibration**

General note – there is a need to better define the study area for the noise chapter. Additional noise level evidence and testing protocols are generally required for both construction and operation phases of the Project. Without greater detail, the location, type and noise profile of emergency generators are required and need to be **SCOPED IN**.

CLARIFICATION, **SCOPE IN** - the use of river transport and the movement of spoil material. Clearly if spoil is to be moved by road alone, and this would involve potentially a continuous convoy of vehicles albeit over a short duration, then this would have significant implications regards short term impact and the scoping report would need to be amended to take this into full account.

Paragraph 7.1.3 – OMISSION/CLARIFICATION - In line with LP10 (and Policy 53 from the emerging Local Plan) have care homes been considered as sensitive receptors as there are some in close proximity to the Twickenham and Ham boundary? **SCOPE IN**

OMISSION **SCOPE IN** - Sensitive receptors should include all towpath and playing field users within the assessment.

Table 7.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015-~~ 2018 and the LBR ‘~~Pre-~~ Publication’ Draft (Regulation 19) Local Plan (2024~~3~~)

As the new Local Plan has not yet been adopted possibly best to refrain from specifically referring to Policy 53 or at least include ‘emerging’ after it.

CORRECTION - The LBR Construction Code of Practice (2022)

OMISSION METHODOLOGY - In the introduction the potential working day for the project is suggested to be from 7a.m. to 7p.m. There is also mention made of TBM needing a 24-hour schedule of spoil removal. All noise impacts etc must be considered in the context of the non-standard working hours being proposed. (As per above, it is noted that standard permitted hours in LBRuT are 8am - 6pm, Mon – Fri. 8am – 1pm Saturdays and no work on Sundays or bank holidays or days of public mourning without prior consent.)

Paragraph 7.4.1 – CLARIFICATION - Map is blurry for Plan 1.1 in Appendix A

The following Sections of the submission are of concern:

Paragraph 7.4.2 and 7.4.3 - OMISSION METHODOLOGY - describes the construction noise assessment study area as 300m and the vibration assessment as 100m from any construction activity. Paragraph 7.5.1 describes “sensitive receptors” which include dwellings, community facilities and PROWs amongst others. Paragraph 7.5.4 is a list of some possible sensitive receptors. The list of receptors referred to in this section are all located between 10m and 150m from construction. This contradicts 7.4.2 and 7.4.3.

Note - Thames Water should make clear what areas will be included in the Noise/Vibration and dust assessment. For example, the Hawker Centre or the Park Gate Playground are, respectively, approx. 170m and 45m away from the TLT Northweald connection shaft. The Lensbury hotel is approx. 170 to 200m from the construction compound at Burnell open space. Broom Water is less than 100m away. Sensitive receptors for Noise/ Vibration and dust must be clearly identified and all impacted receptors included in the scoping – these receptors should **SCOPE IN** under paragraph 7.5.4:

Beaufort Close and Beaufort Road, Broom Water West, Broom Water, River Reach, Trowlock Island, Haliburton Road, Northcote Avenue, Worple Avenue, St Stephens Junior School, Chase Bridge Junior School, Lensbury Club, West Middlesex Hospital, Worple Primary School

Paragraph 7.5.15 – **CLARIFICATION, SCOPE IN** - The position is not supported by any additional acoustic assessment and appears to be anecdotal. In particular, significant concerns are held about the 50Hz electricity frequency corresponding to 100Hz transformer hum and subsequent harmonics i.e. 200Hz and 400Hz. Such wavelengths are very difficult to block and can be experienced significant distances away from the source. As such, without further evidence this impact cannot be ‘**scoped out**’ within Table 7.13 - Noise and vibration impacts scoped in and out of further assessment.

**SCOPE IN** – This chapter also does not detail the tertiary treatment proposed to ensure the effluent is of suitable water quality for discharge including meeting Bathing Water standards. As such a number of tertiary treatment options are available including ultraviolet disinfection. Such systems generally use ‘medium pressure’ ultraviolet technology with the disinfection lamps deployed powered by control systems with large transformers. Given the volume of flow required it is likely an extensive treatment would be required with implications regards low frequency and the nature of the tertiary treatment should be considered within Chapter 7.

Paragraph 7.5.15 – OMISSION, **SCOPE IN** - The possibility of emergency generators and the need to test them is described here. Note - There is no indication of emergency generators in the project description (and not in any of the consultations). The operational impacts of the noise from these is scoped out but given the absence of any information as to where any such generators may be this should be **Scoped In**. Also, noise is cumulative, you should not simply break down elements, say they are not significant and scope them out.

Paragraph 7.5.15 - The acoustic limits for testing and days on which testing is permitted, i.e. bank holidays and weekends should be avoided, should be considered within the submission.

Paragraph 7.5.16 – CLARIFICATION - The submission should confirm there are no residential dwellings associated with the pumping stations.

Paragraph 7.5.18 - CLARIFICATION - The submission should include any measures which will be incorporated to ensure laminar flow is generally achieved for example the inclusion of surge protection.

Paragraph 7.6.4 – OMISSION, **SCOPE IN** - Proposed that no baseline vibration survey is undertaken and the vibration baseline is assumed to be zero. This cannot be agreed. It is recommended that baseline assessment is taken at nearest sensitive receptors to ensure cumulative impact does not go above threshold without appropriate mitigation

Paragraph 7.6.10 – CLARIFICATION - Unclear what is being assessed on a monthly basis. LBR ‘Development Control for Noise Generating and Noise Sensitive Development’ (page 25) states that permanent real time web enabled and periodic noise and vibration monitoring must be undertaken for the duration of demolition and construction phases. It would be helpful to understand how often they propose to periodically assess this in line with the guidance as monthly may not be appropriate for the level of work they are undertaking

Paragraph 7.6.15 – CLARIFICATION -In respect of selecting the Category C threshold values, or the ambient noise level, whichever is the higher, as the adopted SOAEL takes no account is taken for those areas which lie within Category A or B and is contrary to Noise Policy Statement England which reports "It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times".

Paragraph 7.6.18 - As such we concur with the approach used with limits presented within High Speed 2. However, under the heading Construction vibration and Table 7.5 Construction vibration LOAELs and SOAELs limits are given in terms of PPV. Additionally, VDV and the limits as given within High Speed 2 and reproduced below should be considered.

<b>Vibration</b>	Lowest Observed Adverse Effect Level	VDVday[m/s <sup>1.75</sup> ]	0.2
		VDVnight[m/s <sup>1.75</sup> ]	0.1
	Significant Observed Adverse Effect Level	VDVday[m/s <sup>1.75</sup> ]	0.8
		VDVnight[m/s <sup>1.75</sup> ]	0.4

Paragraph 7.6.25 – CLARIFICATION – LBRuT SPD ‘Development Control for Noise Generating and Noise Sensitive Development’ (page 24) states VDV would be assessed in accordance with BS6472-1:2008 – Thames Water refer to ISO 14837-1 in paragraph 7.6.25, is this a drafting error ?

#### Construction Equipment Emissions

Infrastructural projects should seek to meet or exceed the requirements of the Mayor of London’s Low Emission Zone for construction machinery.

This escalating set of requirements is set out at <http://nrmm.london>

Construction plans should set out how equipment is to be appropriately procured and deployed according to the EU framework of emission standards under EU97/68 and 2016/1628.

**Chapter 8: Historic Environment**

Table 8.1 – OMISSION - The Thames Landscape Strategy 1994 and 2012 update and the on-going Joint Thames Strategy Refresh (2023) should be included in Table 8.1 Relevant Legislation, policy and guidance. Specifically, the Thames Landscape Strategy Weybridge to Kew.

Table 8.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR ‘~~Pre-~~Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

*Summary of Scope for the EIA*

The key heritage impact both in construction and operation will be the river intake located on the north bank of the River Thames, close to Teddington. There will also be construction impacts from the outfall structure in the same location but it is noted that, when completed, the visual impact of this addition will be minimal, as per the indicative image in figure 2.8.

In terms of the Summary Scope for the EIA, the proposed scoped in heritage assets and the identification of the potential impact is the agreed. The addition of Teddington Lock Conservation Area is also supported as per concerns raised in the consultation in August. However, it is also considered that the grade II listed Teddington Footbridge should also be **SCOPED IN** for at least construction impacts due to the potential visual impacts from the bridge itself. This does not need to form an additional heritage receptor but instead, the Teddington Lock Conservation Area heritage receptor should be extended to include ‘and listed Teddington footbridge.’

**SCOPE IN** - In addition, Broom Water Conservation Area should be included given its proximity to the site. The CA is referenced in paragraph 8.4.19 but has been missed out of the scoping completely.

**SCOPE IN** - Buildings of Townscape Merit (non-designated heritage assets) on the northern side of the river including the Lensbury Club and houses on Broom Water and Broom Water West – opposite intake/outfall - should be assessed in terms of impact on their setting

**SCOPE IN** - Teddington Footbridge (listed building) should be scoped into the views assessment and should be assessed in terms of impact on its setting.

It is agreed that Ham Common and Parkleys Estate Conservation Area and associated Listed Buildings should be scoped out of the full assessment for both construction and operation due to very limited intervisibility caused by existing built form.



In terms of the intermediate shaft near Ham Lands, if the option of siting it in the Ham Street Car Park is pursued, it is considered that the Ham House CA should be **SCOPED IN** and assessed under 'operation' given it will be sited within the CA rather than the alternative location which is just outside. Chapter 2 does not give much clarity over the final appearance of the shaft once operational, just during construction so it is not clear of the visual impact.

## Chapter 9: Terrestrial Ecology

Paragraph 9.1.2 – OMISSION, **SCOPE IN** - Habitat management and monitoring plans (HMMP) should be provided to demonstrate how the TDRA development will improve biodiversity in the long term.

Table 9.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR '~~Pre-~~Publication' Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Paragraph 9.4.6 – OMISSION, **SCOPE IN** - The above-ground sites could also have an impact on river ecology given the proximity of some of the sites to the river (e.g. Ham Street Car Park and Burnell Avenue Open space)

Paragraph 9.4.8 - OMISSION METHODOLOGY - The sources of information mentioned are insufficient to provide a robust baseline for the biodiversity assessment and would only partly be compensated by field surveys which would need to be undertaken over many seasons. Unless these have already been undertaken, there seems to be too little time for survey work before the planned submission of the EIA. Further data should be sourced.

Paragraph 9.4.17 - OMISSION - Table 9.4 should include more information to justify the proposed cut-off distances for exclusion (e.g. badgers and bats). Two Lipped Doorsnail should be added to protected species – **SCOPE IN**.

Paragraph 9.4.20 – OMISSIONS, **SCOPE IN** - Table 9.5 has several important omissions. Ham Street car park is next to the River Thames, but it is not mentioned, unlike the entry for Burnell Avenue. The Ham Street Playing field should also have the River Thames included as part of the playing field floods from the river several times a year

Paragraph 9.6.11 – OMISSIONS, **SCOPE IN** - Table 9.5 neglects to include the sensitive marsh area of Ham Lands next to the Ham Street car park.

Paragraph 9.7.5 - CLARIFICATION - The EIA is unclear regarding where the Biodiversity Net Gain will be delivered. This Council encourages that BNG is delivered locally at the point of impact.

The BNG assessment must follow best practice principles and methodologies for development and comply with BS 8683:21.

The terrestrial ecology chapter does not reference protected trees at the side of Park Gate woods nor the protected group of trees in Park Gate woods (Burnell Above Ground area and North Weald above ground area) – these should be **SCOPED IN** and greater clarity provided

by Thames Water that it will properly identify and assess all protected trees in the assessment area.

**CLARIFICATION - Biodiversity Net Gain** “The Project will meet a 10% Biodiversity Net Gain (BNG), in accordance with the requirements of the Environment Act 2021. The objective of the BNG will be to leave the natural environment in a measurably better state than prior to the Project, through habitat creation and/or enhancement.” Note – Thames Water are requested about how or where BNG improvements will be made. There is no reason given as to why TW have not considered aiming for more than the minimum BNG expected. While it is acknowledged that this target has not been adopted and used for development management purposes and following debate at the EIP, it appears unlikely that the 20% figure will become adopted policy, Thames Water are requested to provide more detail on this topic.

For information, the reference in the public domain is in the [Council's record of actions arising from hearings \(Week 3\) \(HA-03\)](#) which captures points the Inspectors set out at the end of all of the hearings. This states that the Inspector has directed that a modification would be needed to the draft Local Plan to align the borough's minimum Biodiversity Net Gain requirements with national minimum requirements at 10% (rather than 20%).

## **Chapter 10: Aquatic Ecology**

General note - it is understood that the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process provides the regulatory framework to ensure proposals meets stringent environmental standards. The scheme will also need environmental permits that the Environment Agency regulate.

A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics.

The Watercourse Unit Module (previously referred to as the Watercourse Metric and/or Rivers and Streams Metric) (one component of the Biodiversity Metric 4.0) (or any superseded version) will need to be submitted for the river element of the BNG metric, where the BNG guidance advises this is necessary in order to provide increased watercourse connectivity and associated habitat improvements.

**SCOPE IN** - The Council expects development adjacent to rivers to contribute to improvement in water quality where relevant, to ensure that development meets the objectives of the Water Framework Directive.

**SCOPE IN** - The Council expects the EIA to demonstrate that the TDRA Project causes no change to the chemical make-up of the river water and the temperature, which could harm river life, including insects, plants, fish and birds.

**SCOPE IN** - The Two Lipped Doorsnail needs to be scoped in to protected species.

Table 10.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR ‘~~Pre-~~ Publication’ Draft (**Regulation 19**) Local Plan (2024**3**)

Paragraph 10.4.32 - OMISSION - Other data sourced should be investigated for evidence of important species. As with terrestrial ecology, GiGL records alone may not be sufficient for the EIA.

Paragraph 10.4.38 - OMISSION METHODOLOGY - Thames Water state "no further change to current baseline is envisaged". Note - Can Thames Water need to explain further the assumption underlying this statement? Does this mean that no more baseline surveys are being done? Can Thames Water make clear they have undertaken surveys on all appropriate issues in all seasons?

Table 10.5 – OMISSION, **SCOPE IN** - Aquatic protected and notable species from within 2km of the EIA Scoping Boundary. Note – this table does not include Sea Trout (Salmo Trutta) in the list of protected and notable species of fish. Sea Trout is identified as a priority species that is declining. Sea Trout is a migratory species that spawns in freshwater and so has a life cycle dependent on sea and freshwater environments such as that in the TDRA outfall area. Thames Water should confirm that they have correctly identified all relevant aquatic receptors for their scoping.

OMISSION - BNG is mentioned briefly in the EIA scoping document in relation to the river but with no information on the scope of the aquatic assessment. The following documents may be useful. PAS Watercourse Metric FAQs - final.pdf Statutory biodiversity metric calculation tool - Case study 3 - River restoration.pdf

Paragraph 10.4.8 - Abstracted water should be **SCOPED IN**. Storm surges of sewage from Hogsmill and Moles mean you must assess this water quality. Thames Water has changed its wording from the abstracted water being “the same” as in the Thames Lee Tunnel to “similar”... so this should not be scoped out.

Paragraph 10.7.4 – CLARIFICATION - A qualified assessor is needed for river condition assessment as part of BNG. Thames Water says ."The Project will meet a 10% Biodiversity Net Gain (BNG), in accordance with the requirements of the Environment Act 2021. The objective of the BNG will be to leave the natural environment in a measurably better state than prior to the Project, through habitat creation and/or enhancement" There is no reason given as to why TW have not considered aiming for more than the minimum BNG expected While it is acknowledged that this target has not been adopted and used by LBRuT for development management purposes and following debate at the EIP, it appears unlikely that the 20% figure will become adopted policy, Thames Water are requested to provide more detail on this topic.

Paragraph 10.8.1 – OMISSION, **SCOPE IN** - In Table 10.7, summary of scope for aquatic ecology numerous entries are Scoped Out for Operation but there seems to be no consideration of longer-term such as the cumulative impacts of components in the treated

effluent on the aquatic flora and fauna and organisms at the aquatic/terrestrial interface. These should be scoped in.

## Chapter 11: Ground Conditions and Contaminated Land

General note - *Embankment stability, collapsible ground, ground subsidence impacting the Project or causing damage to neighbouring land or property* is scoped out, in both construction and operation. This cannot be agreed. There is concern in relation to scoping out during construction, due to (as set out in paragraph 11.3.6) potential issues or risks related to the stability of land and property being mitigated by design alterations. While paragraph 11.2.1 suggests consultation responses were anecdotal, there have been instances in the borough of land collapse, such as the recent closure on the Thames Towpath at Kew. This comment is also linked with Chapter 20, which also scopes out all potential major accidents and disasters effects, for example a land collapse. With ground investigation reports due, it is requested that this matter is **SCOPED IN** during construction along with the other ground conditions considered in this chapter.

Table 11.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR ‘~~Pre-~~Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Paragraphs 11.4.17 - 11.4.22 – OMISSION, **SCOPE IN** - Figure 11.3 and Table 11.4 do not include the areas of Ham that were subject to infilling of sand and gravel workings with waste before housebuilding on some of the land - officers are of the view that there is likely to be landfill (building waste) at the former Ham Gravel Pits, this will need to be considered in the scoping report.

It is concerning that the Scoping report appears to completely miss the fact that sand and gravel were extracted from large parts of Ham in the first half of the 20th century and infilling with rubble, rubbish, abandoned vehicles, etc took place from the late 1940s to the early 1960s when houses were built on some of the infilled land. The depth of the infill is unclear, but one estimate is 15 metres or more.

Plans should also be submitted in regard to any off-grid energy supply requirements where temporary grid supply is demonstrated and evidenced not to be possible.

These should include use of battery pack and inertial hybrid options to keep generator loading optimal and reduce operational hours of the engine to a minimum.

Paragraph 11.4.21 – OMISSION, **SCOPE IN** - Table 11.6 summarises historical OS mapping, but the information about land use in Ham in the 19th and 20th centuries is incomplete. The infilling of sand and gravel workings was active for much longer than the information provided suggests.

Paragraph 11.7.2 – OMISSION, **SCOPE IN** - The proposed tunnel will run under some residential and commercial properties and the EIA should include an assessment of whether this will lead to an increased risk of subsidence.

Paragraph 11.8.6 - OMISSION **SCOPE IN** - in Table 11.10 Under Land and Property the entry concerning “Embankment stability, collapsible ground, ground subsidence impacting the

Project or causing damage to neighbouring land or property during construction” should be **SCOPED IN** rather than SCOPED OUT as this must be assessed further by the ground investigations. (p239) Thames Water suggest not scoping in the possibility for “Embankment stability, collapsible ground, ground subsidence impacting the Project or causing damage to neighbouring land or property during construction”. NOTE – it is acknowledged that a comment advising that this will be assessed further by ground investigation it is considered that this should be scoped in pending the Ground Investigation results.

Table 11.6 – OMISSION, **SCOPE IN** - “Summary of Historical OS Mapping “– the OS historical mapping for the 250m area for Burnell and Northweald does not refer to the Aircraft factory which was in the area 1917 – 1992. The factory was decommissioned circa 1990s. Given this Thames Water must clearly show they have correctly identified all potentially contaminated land areas in the assessment area - it will be important to survey Royal Park Gate open space for contaminants before any excavation in this area. This is important to rule out the presence of any contaminants that could pose a risk to the river and the abstraction of water and transfer to the Thames Lee tunnel.

Table 11.10 – CORRECTION - Summary of the Scope for Ground Conditions - error, row 3, the column referring to LAs for the infrastructure reference including TLT Northweald Lane should include RBK.

## Chapter 12: Townscape and Visual Amenity

General note – **SCOPE IN** - Reference is made to the Thames Path but not its classification as part of a National Trail (Thames Path National Trail). The building over of the lower Thames Path at the intake site is not described nor the resultant change in character and usage this will create. This issue should be clearly described and scoped in as appropriate under all of the topic headings; in particular Townscape and Visual amenity, Human Health, Socioeconomics, Community, Access and Recreation and Traffic and Transport.

Table 12.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR ‘~~Pre-~~ Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Table 12.2 – CLARIFICATION / ERROR - Townscape designations column for Above Ground Sites includes abstraction/outfall ?

Paragraph 12.4.12 – OMISSION, **SCOPE IN** – should reference the listed Teddington Lock footbridge

Paragraph 12.4.13 – OMISSION, **SCOPE IN** – should include reference to N Thames riverside the Broom Water Conservation Area, Trowlock Island, Broom Water, Broom Water West and The Lensbury hotel/water centre and sports club

Paragraph 12.6.28 - OMISSION - For the purpose of this TVIA, it is proposed that the visual assessment will be supported by a viewpoint assessment. Eight viewpoints are proposed”  
NOTE - Where the Intake and Outfall will be constructed on Burnell open space there are 2 of the viewpoints: one from the Hawker centre riverside and one from Teddington weir bridge. It

is not clear if there will be scoping proposed for other views: e.g. the views from Broomwater, Trowlock Island and the Lensbury Club/Water Centre side of the river, from the river itself or views of users on the towpath, roads. There is no mention of the visual impact of Kiosks in Burnell open space. All of these other viewpoints must be '**SCOPED IN**' to the Townscape and visual amenity scoping and Type 4 visuals (as for eg view 108) created to illustrate the impact.

**Table 12.11 - Summary of Scope for the EIA**

**Construction phase**

**Row for Intermediate shaft at Ham Lands – OMISSION, **SCOPE IN RECEPTORS**** - The potentially sensitive visual receptors should also include recreational users along Thames Street, Ham Playing Field (depending on final location of shaft) and the footpaths on Eel Pie Island and residents of Eel Pie Island and nearby residential receptors on south bank

**Row for Intake, outfall, reception shaft, connection shaft, TLT connect-ion shaft and temporary works areas – OMISSION, **SCOPE IN RECEPTORS****

- Visitors/members of the Lensbury Hotel (155 bedrooms), Lensbury Watersports Centre and other facilities (25 acre site including 24 tennis courts, squash courts, swimming pool, playing fields, gym and fitness facilities) – training facilities for high profile teams e.g All Blacks, England Lionesses, Man Utd.
- Residential receptors to north at Broom Water West, Broom Water, River Reach and Trowlock Island
- Residential receptors to south at Beaufort Road as well as Burnell Avenue

**Intake, outfall, reception shaft, connection shaft, TLT connect-ion shaft and temporary works areas - CORRECTION** - Spelling mistake 'King Hery's Mound' should read King Henry's Mound.

**Mogden STW site – OMISSION, **SCOPE IN RECEPTORS**** – The potentially sensitive visual receptors should Scope In visitors/spectators to the Allianz Stadium

**Operations phase**

**Intermediate Shaft and Intake/Outfall – **SCOPE IN**** - As per comments above and in addition the following:

**Intake, outfall, reception shaft, connection shaft, TLT connect-ion shaft and temporary works areas – OMISSION, **SCOPE IN**** - The potentially sensitive visual receptors should Scope In Recreational users on the Thames

**CORRECTION** – error in the LPA column in the last row of the table should show LBK alongside LBR for Intake and Outfall screening. Thames Water must identify all areas, issues and impacts to be scoped correctly.

**Table 12.11 – OMISSION** – should include Thames Landscape Strategy vistas

CLARIFICATION – please clarify for the Intermediate shaft and Intake/Outfall that the term ‘Recreational users of the Thames’ does **Scope In** the many visitors on river cruise boats eg Turks and Colliers boats and the river education boats of River Thames Boat Project

### Chapter 13: Water Resources and Flood Risk

General note on water quality - the regulator for rivers is the Environment Agency and while outside our normal regulatory function, the Council hold concerns over the impact on water quality the TDRA Project would or could have on the Thames and its ecology. The Council maintains the view that there needs to be some independent and ongoing assessment of water quality, including a clear testing regime, before, during and after the proposal that has been agreed by all 3 Councils. This assessment needs to be transparent and instill public confidence should the scheme go ahead. Also, there would need to be an action plan with clear triggers if there is ultimately an impact on water quality.

There will need to be resources for the LA's to manage and regulate the environmental impact during the construction and operation phases - **SCOPE IN**.

General note on flood risk - As identified in the construction phase impacts, there are potential impacts to the Burnell Avenue site and nearby offsite developments from increased pluvial and fluvial flood risk. Permanent infrastructure and hardstanding will be constructed at Burnell Avenue within Flood Zone 2 and 3 which has potential to reduce the floodplain volume. There would also be an increase in impermeable areas, which could increase surface water runoff rates to areas on-site and off-site developments.

The proposed development must meet the requirements of the Local Plan, the Strategic Flood Risk Assessment and the London Plan Policy SI 13 Sustainable Drainage. Due to the risk of surface water flooding on the site, a drainage strategy must be provided outlining how the development will implement sustainable forms of drainage, especially where adding impermeable area. These features should be implemented preferentially according to the hierarchy of drainage as detailed in the London Plan.

The development should achieve greenfield runoff rates or achieve as close as reasonably practicable, and should provide evidence of the greenfield, current and proposed runoff rates. Evidence should be provided that the site will not flood in the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and on-site flow as a result of the 1 in 100 year event with a climate change consideration (40%) must be suitably managed.

As the site is located in Flood Zone 2 and 3, a detailed Flood Risk Assessment must also be provided. This should also take into account the planned decrease in use of the Thames Barrier, and associated increase in flood risk.

The drainage strategy and Flood Risk Assessment requirements also apply to the Ham Playing Fields/Ham Street Carpark site.

Figure 13.1 – CLARIFICATION - Map blurry

Page 331 - CLARIFICATION - All above ground sites – what is significant volumes of water use and why has it been flagged as potential impact?

Table 13.1 - OMISSION – The Thames Estuary 2100 Plan should be included in relevant legislation, policy and guidance. This relates to the current and future operation of the Thames Barrier which controls water flow levels which impact this stretch of the river. The impact of the changing use of the Thames Barrier and impact on water levels should be understood as part of the Environmental scoping and assessment.

Table 13.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015-~~ 2018 and the LBR 'Pre-Publication' Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Table 13.1 – OMISSION – needs to refer to Port of London Teddington to Broadness Recreation users guidance.

Paragraph 13.4.2 – CORRECTION - Sentence is repeated.

Paragraph 13.4.8 – CLARIFICATION - Note that Scoping report states SW flood maps unlikely to have accounted for surface water drainage system on site and therefore there is an over-estimate of SW flood risk. More details are required to demonstrate this.

OMISSION THEME - The intake will be in flood zone 3, yet there is no reference to the consideration that this may mean that the structure could need to be constructed higher than the “indicative” photo of the intake and therefore be more intrusive than proposed to be assessed. It should be **SCOPED IN** as part of the EIA that this flood risk has been taken into account in the design of the Intake.

CORRECTION - There is no security fencing around the structure in the picture. This is considered a misrepresentation of what will be needed.

OMISSION , **SCOPE IN** - No reference to flood risk on the land and properties opposite the abstraction plant (designated flood risk 3a) specifically Broom Water Conservation Area, Lensbury Club and Water Centre - see figure 13.2 Flood zone map,

CLARIFICATION, **SCOPE IN** - During construction, with a cofferdam projecting 10m into the river, planned to cover at least on one winter period with its high waters and regular Environment Agency flood alerts and warnings, there is considerable concern about significantly increased flooding during both construction and operation:

“The foundations of the caisson will extend into the river Thames 10m from the riverbank. The excavation area will be 20m wide, 40m long and 9m below the river level. The structure will be constructed from reinforced concrete. When completed the structure will project into the river up to 5m”. Thames Water Strategic Resource Options: Annexe B5 Initial Environmental Assessment Para 2.3.2

Paragraph 13.5.31 – OMISSION, **SCOPE IN** - there is a noted increase in impermeable areas, but no mention of mitigating this through use of impermeable alternatives or nature-based solutions to decrease surface water runoff on the site



Paragraph 13.7.4 – COMMENT - "Development and implementation of SuDS will be considered as further mitigation measures to control water runoff and volumes". There should be greater emphasis on sustainable approaches to managing water runoff and volumes, with SuDS and nature-based solutions as the priority solution for mitigation measures, rather than being considered.

Paragraph 13.7.5 – ADVICE - Any Drainage Strategy should focus on sustainable and nature-based solutions to manage surface water runoff, with an emphasis on controlling and reducing runoff

Table 13.10 - CLARIFICATION - *Tudor drive, Mogden STW* have been scoped out as an off-site developed area impacting on surface water quality and flood risk (for Tudor Drive) on the basis it is in flood zone 1 nor is it connected to any watercourse. Clarification required on this approach, that whilst they are not hydrologically connected, they will not have an impact or be a hazard on these areas for increased flood risk or surface water quality.

CLARIFICATION - *All above and below ground sites or all aquifers* have been scoped out as the project will not have any interactions with groundwater. More clarification is required considering the GLA Drain London mapping shows areas close to Teddington Weir with increased potential for elevated groundwater.

CLARIFICATION - the *principal bedrock aquifer* has been scoped out based on the tunnelling being completed within London Clay. Further information is supplied to give assurance how near the tunnelling is to the edge of London Clay for example.

CLARIFICATION, **SCOPE IN** - *All above ground sites for potential impacts on the riverbed/and or bank stability* have been scoped out. Further clarification is sought that whilst there are no other activities planned at the riverbed itself that there isn't a cumulative impact or change of flow that will affect the riverbed/bank stability.

## Chapter 14: Human Health

General note - it is noted that it is proposed to undertake a comprehensive HIA which will be integrated into the EIA process.

Environmental Impact Assessment (EIA) is a process to examine the likely significant effects of a project. 'Human health' is one of the topics that EIA is required to consider. EIA legislation provides a vital safeguard in protecting health by identifying potentially significant adverse effects on human health arising from proposed major planning developments. For this project a traditional approach should be adopted with particular emphasis on health protection issues and safeguarding of amenities.

Paragraph 14.1.3 – CLARIFICATION/ADVICE - It is important that reasons are given in terms of weighting of interactions between different health variables with regards to population impact. Focus should be on the 'likelihood' of the project influencing health, and if an effect is likely the level or 'significance' and 'sensitivity' of that impact assessed. Likely effects

should be linked to plausibility (source, pathway and receptor) and probability (when and if those effects could occur).

Paragraph 14.1.4 – ADVICE - Definition of ‘Population’ in terms of reference to ‘shared characteristics’ should be removed. Emphasis should be on the inhabitants of the area likely to be impacted (positively or negatively) by the project including the magnitude of the impact and any mitigation measures that may be needed including any unintended health risks.

Paragraph 14.1.6 – OMISSION - In relation to vulnerable groups, this must be linked to the impact of the project at site-specific and local levels. This should include review of ‘health pathways. It should describe nature of the impact and level of significance of the project on these vulnerable groups including any anticipated change in health outcomes.

Paragraph 14.2.4 - OMISSION - “Thames Water has established a River Stakeholder Forum and reports into the pre-existing Mogden Resident group and Maidenhead to Teddington Catchment partnership. Engagement with these groups will be used to help inform the socioeconomic, community access and recreation assessment and this information will be drawn on to help provide information for the health assessment where relevant”. Note - There are no engagements described to any groups / representatives in Ham or Burnell areas. These areas will be impacted by aboveground construction and operation. How will Thames Water ensure that people in those areas will be able to inform the “health assessment”? Please note this consideration also must be referenced in the “Socioeconomic, Community, Access, Recreation” chapter where Thames Water refer to similar engagement.

Paragraph 14.3.5 – OMISSION - In context of health inequalities, this must be considered in context of the project (source) and health outcomes of receptor population including temporary or permanent nature of impact.

Table 14.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~- 2018 and the LBR ‘Pre-Publication’ Draft (Regulation 19) Local Plan (2024~~3~~)

Table 14.3 - CLARIFICATION - Scope of population and human health assessment; “Open space, leisure and, play - Recreational routes such as the Thames Path and National Cycle Network (NCN) route 4 have the potential to be temporarily disrupted which may have indirect effects on health”. NOTE - Although it is scoped in it must be recognised that the impact on the Thames Path is not potential, it is actual. The intake will build over the lower Thames Path national trail resulting in a change in usage patterns between cyclists and walkers. There will also be significant diversions around Burnell open space riverside during construction. This should be considered as a specific land use impact in scoping for construction and operation.

Table 14.3 - OMISSION - P352 and P353 - Scope of population and human health assessment; “Open space, leisure and, play - Areas of green and blue space may also be disrupted during construction and (to a lesser extent) during operation which may result in a change to local play and leisure areas. During operation of the Project there is potential to affect the desire to access areas of green or blue space close to the discharge point. This

determinant has an interaction with ‘Physical activity’ scoped above”. NOTE – The intake and outfall structures will create visual and physical impediments to accessing the river. There will be a loss of “a usable edge” in the river where the intake is; this would result in a safety issue for swimmers, casual recreational paddlers and kayakers as they would not be able to access the riverbank for safety. These access issues need to be fully **SCOPED IN** for construction and for operation.

Table 14.3 – OMISSION, **SCOPE IN** - P353 and P354 - Scope of population and human health assessment; “Community Safety - Health and safety legislation, [...] would ensure no likely significant community safety risks from the built infrastructure and operational plant and therefore community safety is scoped out for the operation stage”. Note - This topic should be scoped in. There are concerns around the ancillary built structures (Kiosks) near the edges of open spaces, creating “hidden” spaces. These can become a focus for antisocial behaviour. This should be scoped in to ensure all aboveground structures are located and designed to limit their use in a negative way.

Table 14.3 - OMISSION THEME, **SCOPE IN** - P357 - Scope of population and human health assessment; “The discharge of recycled water has the potential to alter water quality (or the public perception of water quality) of the Thames downstream of outfall in both the freshwater and tidal stretches of the river which may have ongoing implications for health and wellbeing”. Note – The treated effluent discharge will result in increased concentrations of PFAs, Pharmaceuticals and E Coli which may have direct health impacts on river users (including families with young children). The increased concentrations of harmful contaminants above Teddington in drought (a high usage time for river users) must be assessed.

**SCOPE IN** - The whole area of water standards, duration of examination for impacts, baseline data v specific and relevant substances is woefully underserved in this proposed scope.

Table 14.3 - OMISSION - (Scope of population and human health assessment) in TDRA’s EIA Scoping Report.

For transport modes, access and connections, impacts relating to this dimension are not being considered during the operation phase, but there is the potential for continually used site maintenance access roads to affect access

OMISSION, **SCOPE IN** - Community safety has been scoped out for the operation stage, it should be Scoped In, to ensure mitigation measures are identified to counter a potential rise in anti-social behaviour resulting from the new infrastructure.

Safety risks associated with operation should also be **SCOPED IN** - the intake and outfall structures will create visual and physical impediments to accessing the river. There will be a loss of “a usable edge” in the river where the intake is; this would result in a safety issue for swimmers, casual recreational paddlers and kayakers as they would not be able to access the riverbank for safety.

OMISSION, **SCOPE IN** - Education and training - the report discusses how the project will provide an educational opportunity but does not mention how the loss of woodland and other natural features will impact current educational provision

OMISSION, **SCOPE IN** - Employment and income, this section should also mention the potential loss of income for self-employed residents who make use of impacted spaces (e.g. dog walkers)

OMISSION, **SCOPE IN** - On air quality and pollution these are scoped out for the operation phase but concerns are held regarding the ongoing effects of operation on air quality and light pollution.

OMISSION, **SCOPE IN** - Attractiveness of area; This section does not mention the potential loss of natural habitat (it only mentioned net gain) which should be reported on residents are concerned about the effects of pipe jacking under houses and about declines in property values, this is not reflected in the scoping report

Paragraph 14.4.4 – OMISSIONS, **SCOPE IN** - A selective inclusion of facilities, albeit it is acknowledged that the paragraph is a general one. Although Thames Young Mariners is an important local resource, there are other water sports (and rowing clubs) in the immediate vicinity of the project including at the Lensbury resort (Lensbury Watersports Centre) and at Albany Outdoors in RB Kingston which is an Achieving for Children Provider offering a range of water sports to children and adults.

Paragraph 14.4.9 - ERROR – first reference to LBH should be LBR?

Paragraph 14.4.10 – CLARIFICATION - States that all boroughs have a population “younger than average for England”.

However, it is also relevant to refer here to proportion of residents who are 65 years and over, which overall is lower than the England average but varies between the three boroughs (according to the data in Table 14.2 it is 11.8% in LBH, 14.4% in RBK and 16% in LBR).

Paragraph 14.5.4 – OMISSION, **SCOPE IN** - Vulnerable groups should include those who may live on the river, besides the river as well as people who use the river for recreational purposes.

Paragraph 14.6.6 – OMISSION, **SCOPE IN** - There is a Ham and Petersham Neighbourhood Plan (adopted January 2019) –consultation with the Neighbourhood Forum regarding the HIA is required.

Paragraph 14.6.17 – OMISSION, **SCOPE IN** - One area not mentioned in the scoping document relates to the human health risk from aerosols of chemical, viral, and bacterial hazards generated from tertiary treated effluent passing over the Teddington weir during operation. A risk assessment should be provided. The beach on Teddington weir island is regularly used by families in the summer and kayakers regularly “play “ in the weir pool.

Paragraph 14.6.24 – OMISSION, **SCOPE IN** - Interaction of impacts must consider whether such impacts are temporary or permanent in nature including use of professional judgment where required.

General comment: It is noted that data on deprivation are to be included as part of the ES and there is acknowledgement that those who are “more deprived” may be more susceptible to effects. It is noted that populations in Ham – very close to the proposal – are amongst the most relatively deprived in the borough. This area is one where public transport accessibility is also relatively poor with the community being located within a bend in the River Thames. It may be picked up elsewhere in the report, however, the cumulative impact of these factors should be **SCOPED IN**.

## **Chapter 15: Carbon and Climate Change**

General note, **SCOPE IN** – future impacts of climate change have not been adequately addressed in this document. In Chapter 15, it states that "Potential flood risk impacts will be considered in Chapter 13 Water Resources and Flood Risk. The assessment will incorporate allowances for future climate change to determine flood risk impacts on receptors within the study area that is assessed for that aspect" and in Chapter 13 it states that "Potential impacts to flood risk and water resources infrastructure in relation to climate change are assessed in Chapter 15 Carbon and Climate Change". However, the future assessment is not addressed in the robustness required given that the Project is being created in response to future pressures on water resources arising from a changing climate. There should be more detailed modelling and assessment provided on what the future pressures on the operation and maintenance of the Project will be, in particular with regard to flooding risk on operation of the project and future drought scenarios

Table 15.1 – OMISSION - The following should be included in Table 15.1 relevant legislation, policy and guidance:

- London Borough of Richmond upon Thames Climate Emergency Strategy 2019-2024
- Richmond Climate Emergency Strategy 2024 Action Plan and subsequent updates
- The Thames Estuary 2100 Plan.

The latter relates to the current and future operation of the Thames Barrier which controls water flow levels which impact this stretch of the river. The impact of the changing use of the Thames Barrier and impact on water levels should be understood as part of the Environmental scoping and assessment.

Table 15.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015~~-2018 and the LBR ‘Pre-Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Paragraphs 15.1-15.3 - Correctly sets out the requirement for Environmental Statements of which the key definition is “...describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed envelopment on...Climate” and “a description of the likely significant effects of the development on the environment resulting from... the impact of the project on climate...and the vulnerability of the project to climate change”

Paragraph 15.2.2 – OMISSION CLARIFICATION - Includes commitment to follow circular economy principles “where practicable to do so” more details should be provided on how the circular economy guidance and principles will be followed and what if any circumstances will lead to parts being considered impracticable.

Paragraph 15.4.1 – ADVICE - It is worth noting that this will have to include accurate data on transport emissions (event and non-event days), including for replacement assets from across the country which can be a challenge to gather thoroughly.

Paragraphs 15.4.6 and 15.4.7 – OMISSION, **SCOPE IN** - GHG emissions and carbon budgets do not take into account local targets for net zero - Richmond upon Thames has a target of being net zero by 2043 and the construction and operation of this significant and likely energy intensive Project does not give consideration to the impact on local net zero targets.

CLARIFICATION - Assessment of likely sources of GHG emissions are included alongside potential mitigations to reduce these, but it is not clear as to where these potential emissions will be reported and published. It is also not clear on how much of a priority designing in the reduction of carbon emissions to the construction approach and the operation of the Project will be.

Paragraphs 15.4.8-15.4.11 – COMMENT - Accurately outlines existing climate risks at the location including heat waves exacerbated by the heat island effect leading to wildfire and IT failure and flooding.

Table 15.4 – OMISSION OR CLARIFICATION – is a concern: "Future climate scenarios could lead to increased drought conditions which could require the Project to be utilised more than expected, putting increased pressure on the Project during operation", which does not give confidence that the future scenarios have been adequately modelled and taken into account in the design of the Project.

Paragraphs 15.4.13-15.4.20 – CLARIFICATION - Sets out existing weather patterns and threats and describes projected climate changes. This all seems accurate. Although the UKCP18 high emissions future climate projection seems an appropriate choice, explanation why this rather than other high emissions projections has been used would be welcomed.

Paragraph 15.4.19 – this paragraph considers additional sources of risk from climate change including increased risk and severity of heat waves and flooding as well as risks to foundations from clay shrink-swell and drought. It also refers to Storm Tides and expected sea level rise in the Thames Estuary of 1.15m by the end of the century.

OMISSION, **SCOPE IN** - No reference is made to the changing role and impact of the changing use of the Thames Barrier, and that it will no longer be used to manage smaller fluvial flows by 2035, which is likely to cause increased flooding. There is a footnote (373) referencing the Thames Estuary 2100. But is it not clear that the scoping report will assess the impact of both increased flooding and drought on the biodiversity/habitat of the river and water quality in the area most impacted by the TDRA.

Paragraph 15.5.1-15.5.5 – ADVICE/OMISSION - Correctly sets out the Life Cycle Carbon Assessment (BS EN 15978) methodology which will be used to calculate the development impact on carbon. To conduct this properly, accurate, detailed, and timely data will need to be provided by a number of parties including transport, energy, material, and chemical use. This methodology does not mention emissions from demolition which should be **SCOPED IN**.

Paragraph 15.5.5 (Table 15.3)

- A0 (Surveying) and B7 (operation water use) have been scoped out as negligible. the assumption that these will contribute <1% of the total carbon emissions is considered sound.
  - B5 (Refurbishment) is scoped out as it will occur outside the time frame of the environmental assessment.
  - I agree with all other aspects being scoped in. These include materials (A1-3) transport (A4) construction (A5), in use energy (B6) and chemicals (B1), maintenance repair and replacement parts (B2-4).
- It is a requirement that the development ‘not be likely’ to materially affect the government’s ability to meet its emissions targets. As such it is important that detailed data of all elements of emissions such as transport, construction, O&M etc are provided, to monitor and report on impact.

Paragraphs 15.5.12-15.5.13 – CLARIFICATION or OMISSION, **SCOPE IN** - Construction and operation carbon emission sources are listed. Consideration of emissions from demolition of existing infrastructure should be provided even if only to explain why outside the scope.

Paragraphs 15.5.15 (table 15.4) – OMISSION, **SCOPE IN** - Lists potential risks. Risks that are not included are having the right conditions for foundations and concrete to set well and the risk of flooding causing pollution downstream, or risks to waterways during construction.

Paragraphs 15.6.2 – OMISSION, **SCOPE IN** - Sets out that the crux is “whether a development contributes to reducing greenhouse gas emissions relative to a comparable baseline consistent with a trajectory toward net zero by 2050”. That being the case as well as the negative environmental impacts assessed in the ES the positive environmental impact of the scheme needs to be reported so they can also be considered.

Paragraphs 15.7.2 – COMMENT - Includes maximising the use of on-site materials. This will assess the position of building material and require pre-demolition audits before works commence.

Paragraph 15.7.3 – OMISSION, **SCOPE IN** - no reference to on-site renewable energy generation.

Paragraphs 15.7.7 - CLARIFICATION - Lists some example of mitigation measures including design, specification, and maintenance measures. More detailed information will be needed at later stages. Ensuring regularity of inspections will be a key factor.

### 15.8 Summary of Scope for the EIA

**Paragraph 15.8.1** A summary of those factors to be scoped in or out of the ES is provided in Table 15.9.

- Greenhouse gas emissions are correctly scoped in for both construction and operation phases. However, looking at Table 15.3 specific aspects of operation are scoped out (see above comments on 15.5.5) – these should be **SCOPED IN**.
- **OMISSION/SCOPE IN** - Vulnerability to climate change has been scoped out for the construction phase on the basis that climate changes over the short term are minimal. However, climate changed between the baseline and the expected end construction date in 2031 are likely to be significant and need accounting for.
- **COMMENT** - In combination climate assessment refers to the combined impacts of climate change on environmental receptors assessed for other environmental aspects “i.e. whether the receptor’s susceptibility and vulnerability and/or their value/importance changes based on future climate projections.” As such, it is considered that the applicability of climate change during construction depends on the relevant disciplines’ own methodologies and their baseline years. i.e. 2031 will mean that some disciplines will have to assess against their “future climate” methodology.

### Chapter 16: Socio-economics, Community, Access and Recreation

General note - this section has very little detail even though the Human Health chapter refers to it many times. The topics of community, amenity, access and “severance” are all important topics that clearly link to Human Health and eg Noise Topics etc. The level of information relating to benefits and enhancements should be significantly increased. The whole area is a centre of community activity and wellbeing and this aspect is given scant recognition in the EIA

As a general comment, the construction phase will have a significant impact on Ham and what the Council can book on the Ham Playing Fields pitches which will require mitigation.

Other concerns include

Public health – concerns around the project that there once in operation there could potentially be more water borne bacteria, viruses and parasites

Water quality – linked to the above many water users may enter the water as part of their use of the river (e.g. capsized training drills, paddleboard capsizes) and would express concern about the quality of the water were they to swallow and ingest water

Restricted access – more likely during the construction phase but any restriction on access would affect both the quality of the experience for users and also could affect the viability and sustainability of some of the clubs in the vicinity of the development of the project



Reduced access to the river – linked to the above, reduced access to the river could have a significant impact on the water-based clubs

Reduction in club membership affecting club sustainability – particularly during construction members of sports clubs affected by this project could decide to move to other local clubs further away from the affected area which as above undermines the sustainability of voluntary sports clubs who rely on membership numbers and fees for survival.

Recreational use of the river and towpath– this is an incredibly popular area for casual use of the river by walkers, runners, cyclists, paddleboarders, kayakers and swimmers and any interruption of access to these areas will have a significant impact on these individual users.

Table 16.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015–~~ 2018 and the LBR ‘~~Pre-~~ Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Table 16.1 – OMISSION - Include reference to Ham and Petersham Neighbourhood Plan (adopted January 2019)

Paragraph 16.2.3 – RECOMMENDATION - There is a Ham and Petersham Neighbourhood Plan (adopted January 2019) – may therefore be relevant to include consultation with the Neighbourhood Forum regarding the socio-economic impacts. [Please note the Council and its partners are developing a vision and action plan for Richmond Town Centre referred to comments relating to Transport. An [Engagement Report](#) was published in January 2024.]

Paragraph 16.2.3 – CLARIFICATION – little information on membership of River Stakeholder Forum – should include recreational receptors

Table 16.3 - OMISSION THEME - P411 Potential socioeconomic, community, access and recreation effects. Note - Whilst accepting that this is a generalised table some of the described potential benefits veer into fantasy given that there is no description of how such benefits will accrue and where. So, for example, “Potential for beneficial effects associated with enhancement of recreation and community receptors such as open space and PRowS”. Where would such enhancements be and what designs have been made to this end?

Paragraph 16.4.5 – CORRECTION - Twickenham is located in the London Borough of Richmond upon Thames.

Paragraph 16.4.6 - CORRECTION - Ham is described as south of Twickenham but is located on the opposite bank of the Thames

Paragraph 16.4.6 – ADDITION (in red type) - LBR is least densely populated in part owing to the large areas of green space within its boundary, including Richmond Park, Hampton Court/~~Home Park~~, ~~Old Deer Park~~ and Bushy Park.

Paragraph 16.4.6 – OMISSION, **SCOPE IN** - this paragraph should mention the Ham Close Regeneration project which is currently under construction

Paragraph 16.4.12 – RECOMMENDATION - If the estimates are too small the 2021 Census would give a figure that would be better than no data.

Paragraphs 16.4.14-16.4.15 - DISAGREEMENT METHODOLOGY - Education – the way the information is reported, by combining information about the three boroughs understates the variation between the boroughs which can be quite wide (for example percentage of residents in Hounslow over 16 and without any formal qualifications (18.6%) is around double that of Richmond Residents (9.1%))

Paragraphs 16.4.16 onwards – DISAGREEMENT METHODOLOGY - it is not right that this section provides statistics for combined data across all 3 boroughs? Not a very detailed approach to considering these characteristics. Likely that these characteristics will differ markedly between boroughs.

Paragraph 16.4.26 – OMISSION, **SCOPE IN** - this project crosses the River Thames and interacts with a significant number of water-based activities. Apart from Thames Young Mariners and the Lensbury Watersports Centre, other users of recreational receptors include the following known clubs which may not be exhaustive:

Twickenham Bank

- Twickenham Rowing Club
- Twickenham Yacht Club (includes Paddleboarding)
- Richmond Yacht Club
- Royal Canoe Club
- Informal use by open water swimmers, Paddleboarders, Canoeists and Kayakers

Ham bank

- Albany Outdoors
- Slipway is extensively used by the following:
- Paddleboarders
- Canoeists and Kayakers
- Open water swimmers

The towpath on this side of the River Thames is also extensively used for activities such as walking, running and cycling both informally and formally

The slipway is also the location for the finish of the annual Great River Race – 21.6 miles from Millwall slipway E14 3QS to Ham, Richmond TW10 7RS (with over 2,500 competitors competing for 37 trophies, it is the biggest and most prestigious event of its kind in Europe).

Locations and maps – The Great River Race – 2024

Other recreational receptors include

- Ham Lands – clubs include Richmond Baseball Club & Kew and Ham Association Football Club

- King George's Field - Richmond Park FC, Ham and Petersham Cricket Club & Ham and Petersham Rifle and Pistol Club

Paragraph 16.5.1 – OMISSION, **SCOPE IN** - List of community and recreational receptors should both specifically include the River Thames and Ham slipway which is recognised elsewhere as a major recreational resource.

OMISSION, **SCOPE IN** - List should include specific mention of town and local centres – although it is noted that businesses generally are included in the list.

Paragraph 16.6.4 – CLARIFICATION/GUIDANCE - Note comment that there is limited guidance on the assessment of socioeconomic, community access and recreation impacts in the UK. The comments of the Council's relevant technical experts will be of relevance here. For information the following comments have been received on recreational impacts needing to be assessed:

Paragraph 16.6.17 - CLARIFICATION/GUIDANCE - Note comment that there is limited guidance on assessment of effects of construction on skills and education – contact with colleagues in Economic Development Office are able to provide further guidance on assessing this impact locally within LBR.

Table 16.5 - CLARIFICATION/GUIDANCE - Note Employment and Skills and Education aspects have been scoped out for operation stage as impacts are expected to be minimal – contact with LBR technical consultees necessary to confirm this approach

Table 16.5 – ACTION - Note Access: Land Take aspects have been scoped out for operation stage as no significant effects are expected – Thames Water should contact LBR technical experts to confirm this approach.

## **Chapter 17: Waste and Materials**

Table 17.1 & Paragraph 17.4.5 – CORRECTION (in red type) - The LBR Local Plan ~~2015-~~ 2018 and the LBR '~~Pre-Publication~~' Draft (**Regulation 19**) Local Plan (2024~~3~~)

Paragraph 17.4.5 – OMISSION - Reference should also be made to the London Borough of Richmond upon Thames emerging Local Plan given it is at an advanced ('Publication') stage and may update, add to or differ from the adopted 2018 Plan

Paragraph 17.4.28 – CLARIFICATION - Is there existing capacity at Modgen STW to handle the sludge TTP?

Paragraph 17.5.10 – CLARIFICATION - It is noted that details and tonnages of waste are not known at this stage, hence the number of road and/or river movements transporting waste are also not known with any certainty. **SCOPE IN** impacts from construction waste is also required for this reason.

In line with emerging policy 7 of the new Local Plan the approach of managing the waste should also align with the principles of the circular economy not just the waste hierarchy.

Paragraph 17.7.3 – COMMENT - Whilst it is assumed to be addressed within the Construction Management Plan, the prevention of waste and construction materials being spilled onto streets or being dragged out of sites by vehicles is a very important issue for the Council.

### **Chapter 18: Traffic and Transport**

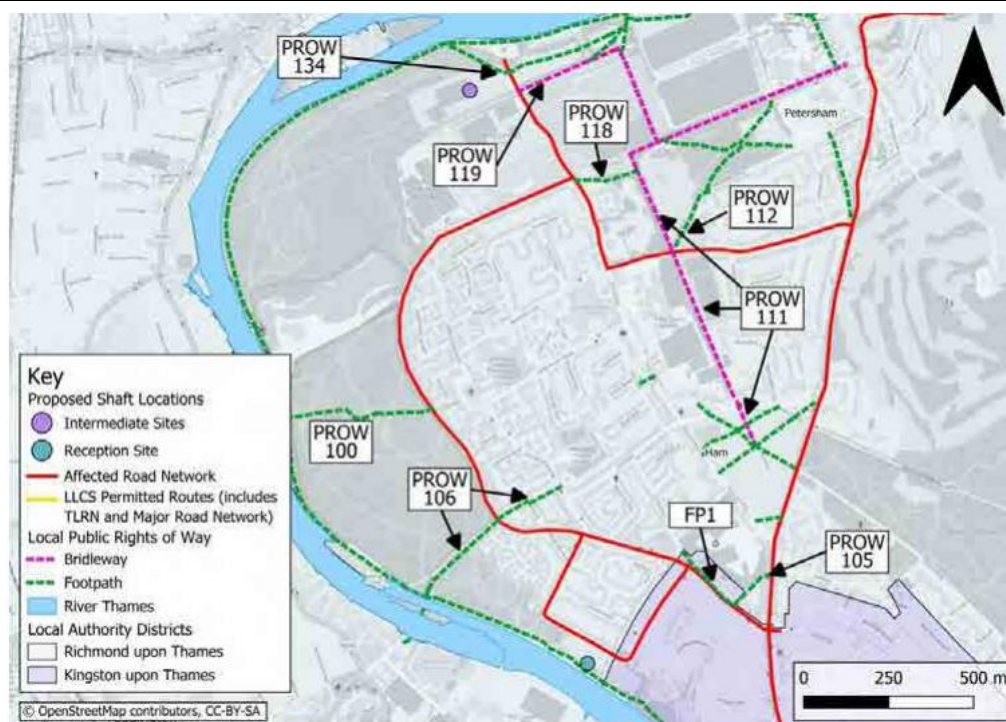
The Council is both Local Planning Authority and Local Highway and Traffic Authority. The comments provided are corporate comments and it is not expected that the highway authority will send separate comments at this stage; however, the highway authority is expected to have detailed comments on any subsequent transport or highways assessments submitted in support of the proposal.

General note – OMISSION **SCOPE IN** - given the scale and significance of the RFU's Allianz Stadium and its proximity to some of the proposed works at Mogden Sewage Treatment Works, especially during the construction phase of the tunnel and disposal of spoil, there is a clear need for all baseline data, methodologies and assessment work to consider and be informed by local traffic and transport conditions on both event days (matches and concerts) and non-event days. This is not explicitly referred to in the Scoping Report at all. This assessment has to include impacts for the transport management plans and other operational requirements set by planning conditions and s106 agreements linked to the use of the Stadium for concerts (55,000 spectators) - planning permissions including refs: 00/1098/FUL (appeal consent) and 06/0154/FUL - as well as match days. Mitigation measures such as no construction vehicles (deliveries and collections) on event days should be considered to offset potentially significant harms to the local and strategic road network, public transport systems, shuttle buses and crowd management.

A similar assessment of the impacts on road conditions on event and non-event days at the Twickenham Stoop (Harlequins home ground) is also required. Again, this is not explicitly referred to in the Scoping Report and needs to be included. The Applicant should contact the Local Planning Authority for further details on the planning history and traffic management requirements for this site. Mitigation on match days during the construction phase should be required.

Table 18.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015-~~ 2018 and the LBR 'Pre-Publication'<sup>1</sup> Draft (Regulation 19) Local Plan (2024~~3~~)

Figure 18.1 – ADVICE - Without necessarily implying support for the A307 South Option, the A307 North Option via Richmond Town Centre and Petersham Road is considered to have a relatively low degree of resilience and would require vehicles being routed through often congested roads with narrow footways. The Council is developing proposals to improve Richmond Town Centre – whilst there are no developed proposals the project aims to enhance Richmond as a place and the road network in the town centre may not in future operate in the way it currently operates.



*Figure 18.2 PROW Routes linking to the local affected road network south of the River Thames*

**Figure 18.2 – COMMENT** - It should be noted that the routes linking to the affected road network south of the river Thames are very congested, especially the route into Richmond via Petersham Road from Kingston

**Paragraph 18.4.15 – OMISSION, SCOPE IN** - The amenities listed as being within 500m of the local affected road network appear to have omissions (including Petersham Meadows, Russell School, the German School, Ham Polo Club, Ham Youth Club and probably others). Recognition that there will be other amenities potentially affected should be noted.

**Paragraph 18.4.19 – RECOMMENDATION** - We understand 2023 data is now available, so this should be checked for any significant differences from the data used.

**OMISSION** - Traffic counts on A316 and other local roads must be carried out on both event and non-event days at either the RFU Allianz Stadium or Twickenham Stoop

**Paragraph 18.4.32 – RECOMMENDATION** - We cannot confirm if the proposed traffic count locations which are listed “as a minimum” would enable full assessment. We would need to see the totality of the data from all sources. We would strongly recommend agreement with TfL and councils on the traffic survey locations and scope.

**Paragraph 18.4.36 – OMISSION** - It should be noted that a road that is not designated as a cycle route (i.e. because it does not have dedicated cycling facilities) may be no less important a road for cycling. Richmond upon Thames has a high proportion of journeys by bike – the Ham, Petersham and Teddington area is no exception. Many of these roads lack the capacity or width to include dedicated cycling facilities. That roads may not have

dedicated cycling facilities does not negate the need to consider the impact on cyclists – arguably the opposite is true and there is a greater need to consider impact on cyclists on roads where there are no dedicated cycling facilities.

Table 18.10 – OMISSION, **SCOPE IN** - as per 18.4.15, the trip attractors appear incomplete

Paragraph 18.6.4 – COMMENT - The document says that further consideration will be given for the use of water to transport materials, waste and equipment as the design develops. We are sceptical that anything will come of this.

Paragraph 18.6.6 – CLARIFICATION - We note the locations in Richmond upon Thames where HGV flows are expected to increase by greater than 30%. For “Dukes Avenue, between Riverside Drive and Hardwicke Road” we think the word “between” may be the wrong word.

Paragraphs 18.6.14 and 18.6.15 - OMISSION - We consider the duration of the impact to be important – it is not only the magnitude that determines the significance.

Table 18.13 – CLARIFICATION - In the row titled “Severance” reference is made to “potential temporary disruptions to local communities, such as limiting access to essential services like schools, healthcare....”. For the avoidance of doubt, we think it should be clearly stated that access whilst it may be disrupted or diverted would always be maintained to essential services for all.

OMISSION, **SCOPE IN** - In the row titled “Hazardous/large loads”, consideration should be given to transporting abnormal loads/plant/the TBM components by river.

## **Chapter 19: Cumulative Effects**

General note – COMMENT - the River Thames Scheme (RTS), a nationally significant infrastructure project which will impact the Teddington Lock and Weir area in terms of the land and the river, also proposes works in the immediate vicinity at Teddington Weir. This is a flood alleviation scheme currently going through the DCO process. It is noted that reference to assessing the cumulative impacts of the RTS and TDRA Projects is included in Appendix G– Cumulative effects and will be fully taken into account. No other mention or recognition in the scoping document is surprising as there would be impacts from both RTS and TDRA in the same part of the river. There are risks, potential overlaps (e.g. BNG), and proposed mitigations associated with the construction and operation of both schemes and these need to be reflected in the TDRA EIA.

OMISSION, **SCOPE IN** - There is also no recognition of Thames Water’s recently announced Lower Thames Surbiton to Queen Mary Reservoir scheme that will abstract hundreds of millions of litres of water from the same stretch of river

CLARIFICATION - what will replace the abstracted water from the Lower Thames Surbiton to Queen Mary Reservoir scheme...new treated water from the enhanced size of pipe now proposed for TDRA? This major potential cumulative impact is not mentioned in the Scoping Report and should be **SCOPED IN** to the assessment on water quality impacts for the TDRA.



Table 19.1 – CORRECTION (in red type) - The LBR Local Plan ~~2015–~~ 2018 and the LBR ~~‘Pre-~~ Publication<sup>1</sup> Draft (**Regulation 19**) Local Plan (2024~~3~~)

Paragraph 19.2 – OMISSION, **SCOPE IN** - The first note in table references the 10km zone of influence notes bats as a qualifying feature. It should also include aquatic and amphibian species, where flooding is a major consideration. Should the distance downstream also be considered as a zone of influence based on specialist environmental guidance?

Paragraph 19.6.16 – CLARIFICATION - Applications that come in during the EIA process will be considered in cumulative effects. Also refused applications will be removed if the 6month appeal deadline passes. It would be helpful to understand up to which point in the EIA process schemes can be added or removed.

Paragraph 19.6.14 – CLARIFICATION - Developments for which only vague plans exist (e.g. allowed for in Local Plan but no application yet) will only be considered in the higher-level parts of the EA not in detailed technical chapters.

Paragraph 19.6.17 (Appendix G) an initial list of sites to be considered has been provided but will need to be continually revised, LPA input will be needed for this.

Paragraph 19.8.1 – OMISSION, **SCOPE IN** - Potential impacts on under developments that have not been mentioned includes the altered hydrology impact on ground source and water source heat pumps.

#### Transport

**SCOPE IN** - The documentation tends to concentrate on other potential development/construction. It is possible that roadworks, such as TfL roadworks on A316 at London Rd junction (commenced 21/10/24), could take place in advance or during the works that are currently unknown about. The project should be cognisant of such potential.

**SCOPE IN** - The recent announcement by the RFU that they plan to redevelop within the Twickenham Stadium site and to increase events, including concerts and sporting activities, appears to have come after much of the Scoping documentation had been put together. This should be noted and the Inspectorate are requested to require that the Environmental Statement takes into account recently published information by the RFU regarding operational changes (nos of events/year – 15 concerts rather than 3) and future construction proposals at the Stadium all of which could occur in the timeframe of the project and therefore requiring the impacts to be assessed, especially for the construction phase.

### **Chapter 20: Major Accidents and Disaster**

CLARIFICATION **SCOPE IN** – Chapter covers the impacts of disasters on the project and potential for the project to cause/contribute to disasters (defined as extremely unlikely but extremely high impact events). It is stated that existing legislation covers all relevant risks but clarification on, what legislation covers what risks, would be welcome at this stage. Key legislations are The Water Resources Act 1991, Control of Major Accident Hazards Regulations 2015 (COMAH 2015), Environmental Permitting (England and Wales) Regulations 2016 (Environmental Permitting Regulations) and NPPF. At this stage it is not

possible to identify if any risks fall outside the scope of this legislation and whether further appropriate processes should be put in place to look for them in the EA and propose action on any found.

Paragraph 20.2.1 - CLARIFICATION - says that local authorities made no specific comments. Whilst it then notes that the focus of engagement was not accidents or disasters, it seems unnecessary to say that councils made no comment about something that they were not asked about! The SR needs to be clear at this point that this is a Thames Water project and that they must take full responsibility for. It is not acceptable for Thames Water to say “councils didn’t raise concerns” or “the council/Planning Inspectorate/Environment Agency/etc. signed this off”. Whenever there is an accident or incident, the promoter will I suspect inevitably try and spread responsibility.

Paragraph 20.2.2 – CLARIFICATION - None of the summer meetings covered major accidents and Thames Water did not request the Council’s emergency planner to attend

Paragraph 20.3.14 – The Reg 19 and Reg 18 & 19 for Richmond and Kingston respectively are noted as local policies relevant to the project.

Table 20.1 – CORRECTION - does not mention Highways or Traffic Management legislation CORRECTION (in red type) - The LBR Local Plan ~~2015~~ 2018 and the LBR ‘~~Pre~~-Publication’ Draft (~~Regulation 19~~) Local Plan (2024~~3~~)

Paragraph 20.6.14 – OMISSION - **SCOPE IN** - last bullet to include in list of types of subsidence during construction – riverbank and towpath collapse (recent incident example in Kew - 20 Oct - <https://www.bbc.co.uk/news/articles/czd19jr85zo>)

Paragraph 20.6.17 (Table 20.2) – OMISSION - **SCOPE IN** - provides a list of risk events to consider, however not specifically mentioned, that should be considered are UXO (unexploded ordinance) and risk to downstream ecosystems from chemicals in floods.

Paragraph 20.6.24 (Table 20.2) – OMISSION - **SCOPE IN** - does not identify the transport of hazardous material. This should be included.

Paragraph 20.6.22 (Table 20.3) - OMISSION – **SCOPE IN** - The major accidents and disasters aspect has been scoped out, in both construction and operation, on the assumption mitigation proposed either as part of the project design or legislation and standards would prevent or reduce the risk to a level that is not likely to cause a significant effect. However, exactly what legislation or design provides what reduction and mitigation is not explained in this section, so it is not possible to assess if this is accurate. By doing this, there is no detailed consideration of the likelihood and magnitude of events set out. This topic was introduced into EIA in 2014 and while signposting to existing assessment is acceptable, it should not downplay demonstrating how risks have been considered to stakeholders. There are understandable concerns that existing regulatory frameworks are not proven, and the project introduces new abstraction and treatment infrastructure for which there may not be existing legal requirements, and codes and standards in place. For example, concerns about pollution incidents, despite recent upgrades there were historic occasions of partially



treated sewage overflows into the River Thames when the Mogden STW become overloaded after heavy rain (as recognised in chapter 11). It is recommended that further clarification is needed to show how/why the potential effects in Table 20.3 have been considered as not likely to cause a significant effect, or whether some aspects should be **scoped in**.

## Appendices

### Appendix B

B.10 – CORRECTION - The LBR Local Plan ~~2015–~~ 2018 and the LBR ~~‘Pre-~~Publication<sup>1</sup> Draft (Regulation 19) Local Plan (2024~~3~~)

Table B.4 – CORRECTION - Relevant Policies LBR Local Plan ~~2015–~~ 2018

ADDITION - List of Policies to include:

LP4 – Non-Designated Heritage Asset  
 LP 17 – Green Roofs and Walls  
 LP28 - Social and Community Infrastructure  
 LP43 - Visitor Economy  
 LP44 - Sustainable Travel Choices

Table B.5 Relevant chapter or policies – CORRECTION - Richmond **Publication** Draft (Regulation 19) Local Plan (~~Regulation 19~~)(2023)

ADDITION - List of Policies to include:

Chapter 7 - Place-based Strategy for Teddington & Hampton Wick  
 Chapter 10 - Place-based Strategy for Ham, Petersham & Richmond Park  
 Policy 5 - Energy Infrastructure (Strategic Policy)  
 Policy 26 - Visitor Economy  
 Policy 30 - Non-designated Heritage Assets  
 Policy 47 - Sustainable Travel Choices (Strategic Policy)  
 Policy 49 - Social and Community Infrastructure (Strategic Policy)

The list of legislation in B.6 is considered relevant to environmental issues and are referred to in the sections of the report dealing with different topics. B2.2 says that it is not necessarily exhaustive, which is presumably the case, and therefore identification should be an on-going process as appropriate.

### Appendix F WFD

OMISSION, **SCOPE IN** - There is no mention of ongoing water quality testing, however, F.5.4 In line with the requirements of the WFD Regulations the following WFD waterbodies are identified as requiring further assessment in Stage 3 of the WFD process.

- Thames (Egham to Teddington) (ID: GB106039023232)
- Thames Upper (ID: GB530603911403)
- Lockwood Reservoir (ID: GB30641865)
- Banbury Reservoir (ID: GB30647003)
- High Maynard Reservoir (ID: GB30641884)

- Lower Thames Gravels Ground Water Body (ID: GB40603G000300)

## Appendix G

Short List – Stage 2 onwards – OMISSIONS, **SCOPE IN** - Construction traffic and other environmental aspects linked to the following developments may have a bearing on the TDRA Project and should progress to the Short list Stage 2 until more detail is known regarding construction programmes, timings and/or environmental impacts

- 22/1168/FUL - Richmond Upon Thames College, Langhorn Drive, Twickenham, TW2 7SJ
- 21/3136/FUL - Richmond Upon Thames College, Langhorn Drive, Twickenham, TW2 7SJ
- 21/2758/FUL – 1- -1C King Street, 2-4 Water Lane, The Embankment And River Wall, Water Lane, Wharf Lane And The Diamond Jubilee Gardens, Twickenham
- 22/3139/FUL - Thames Young Mariners Base, Riverside Drive, Ham, Richmond, TW10 7RX
- 22/2204/FUL - St Clare Business Park and 7-11 Windmill Road, Hampton
- 22/3004/FUL - Kneller Hall, Royal Military School of Music, Kneller Road, Twickenham, TW2 7DU
- 22/2556/FUL- Greggs and No. 2 Gould Road, Twickenham, TW2 6RT

OMISSIONS, **SCOPE IN** - Future applications at

- Allianz Stadium, 200 Whitton Rd, Twickenham, TW2 7BA should also be included due to potential traffic impacts including baseline traffic counts  
<https://www.timeout.com/london/news/this-massive-london-stadium-could-soon-start-hosting-15-gigs-a-year-100824>
- Thames Water's recently announced Lower Thames Surbiton to Queen Mary Reservoir scheme