

**Thames Water's Teddington Direct River Abstraction Scheme  
(TDRA) Environmental Impact Assessment  
SOLAR's Scoping Specification Report for Consultations  
Social, recreational and health issues  
(Kingston)**

**May 2024**

*Report compiled by Mike Pemberton and Dr. Rachael Edwards*

## Summary

Thames Water (TW) is required to undertake an Environmental Impact Assessment (EIA) as part of the approved Development Consent Order planning application process for its proposed Teddington Direct River Abstraction (TDRA) Scheme. Given its recognised standing by TW as “community representative” SOLAR anticipated participation in consultations would be available at the EIA Scoping specification stage, however TW have subsequently refused SOLAR inclusion as a consultee. SOLAR is therefore keen for the recommendations in this report be considered by impacted councils, as statutory consultees, in their Scoping discussions with TW.

The purpose of this study has been to specify issues of concern broadly relating to the social/recreational/health impacts of TDRA as identified by affected communities. TW’s studies to date are largely absent of consideration of these dimensions.

As a result of direct engagement with affected communities the report recommends an evidenced based assessment of both general dimensions of impact across communities, as well as of identified impact conditions unique to specific locations. The report recommends measures appropriate to assess current baseline conditions and the potential future impact of TDRA proposals, and also recommendations as to survey questions and quantification of responses as appropriate.

*Commentary in the document relating to features of TDRA is based on the following TW reports:*

- Annex A4: Teddington DRA Conceptual Design Report, Standard Gate two submission for London Water Recycling SRO. 13 October 2022. Available [here](#).
- Annex B5: Initial Environmental Appraisal Report, Standard Gate two submission for London Water Recycling SRO, 13 October 2022, Available [here](#).
- Teddington Direct River Abstraction and Water Recycling Project, Site Options Consultation, J698-AA-XXXX-TEDD-FN-ZD-100002. October - December 2023. Available [here](#).

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## Context

Thames Water (TW) has been granted approval by the Secretary of State to seek planning permission for Teddington Direct River Abstraction (TDRA) through Development Consent Order (DCO). The DCO process is regulated by statute (Town and Country Planning Act 2008) and effectively bypasses local authorities' decision-making powers. A key part of this process requires TW to conduct an Environmental Impact Assessment (EIA). The purpose of the EIA is for the applicant to declare what they believe will be the environmental impact of their proposed development on affected areas and communities.

SOLAR has been concerned about TW's acknowledgement of the nature and breadth of TDRA's impact. TW's work to date has shown little recognition or treatment of dimensions of environmental impact, land and water, and social, community and health issues. Our communities need to know that TW's reported "beliefs" about these aspects of the current state of affected areas, and their assessment of the future impact of TDRA, will be evidence based.

Regrettably, TW's practice to date regarding open and honest description of key features and issues associated with TDRA has been inadequate. Delayed feedback on surveys of contributors' views to beyond key dates has inevitably raised doubts over their stated intentions to positively engage with key stakeholder communities and the honesty of their feedback. The proposals set out in this report are designed to require TW, through the EIA, to ensure the scope of matters assessed, and their processes for that assessment and making resulting judgements, are evidence-based. TW's EIA will be submitted to the Public Inspectorate for consideration at a subsequent public enquiry which, with other inputs, will report its overall assessment of the proposal to the Secretary of State for a decision

Whilst this report is focussed on the concerns of residents in and close to the locations significantly affected, these concerns are very much also shared by broader stakeholder communities including members of water sports clubs (e.g., rowers, paddleboarders, and open-water swimmers) who travel in to use the Thames stretch above Teddington weir into which treated effluent will be pumped as part of TDRA (see Appendix i and ii – letters from the Chair of British Rowing and the Chief Executive of Paddle UK to the Chief Executive of the Environment Agency raising concerns about TDRA).

## Overview of TDRA's Proposed Development

The TDRA is proposed to take water from the river Thames in drought conditions for transfer to reservoirs in East London and replace it with treated effluent piped underground from Isleworth, under Twickenham and Ham to the river upstream of Teddington weir (Figure 1).

Major features of this proposal are:

- to extract 75m litres of water a day for approximately five months every two to three years from the River Thames above Teddington Weir and transfer to East London
- to replace the extracted water with treated effluent pumped in from Mogden sewage treatment works Isleworth, and when there is no abstraction, to run on a continuous basis a "sweetening flow" of treated effluent into the river – overall about 2.5 times as much treated effluent in as water taken out
- to construct large water extraction and treated effluent discharge structures on the Richmond / North Kingston riverside on the Thames Path National Trail
- tunnelling/pipejacking a 4.5 km tunnel to transfer treated effluent under the streets of Isleworth, Twickenham, and Ham, and an abstraction connection under N Kingston to the Thames Lee Tunnel
- destruction of natural land and habitats in construction and operation processes in St Margarets, Ham and Kingston to build 6 shafts to access the tunnels

- construction support areas half the size of a football pitch laid down for each shaft site with probable 24hr working
- c13,000 HGV movements on local roads

See appendices for further detail on the access shafts and tunnels (Appendix iii) and abstraction and discharge facilities (Appendix iv).

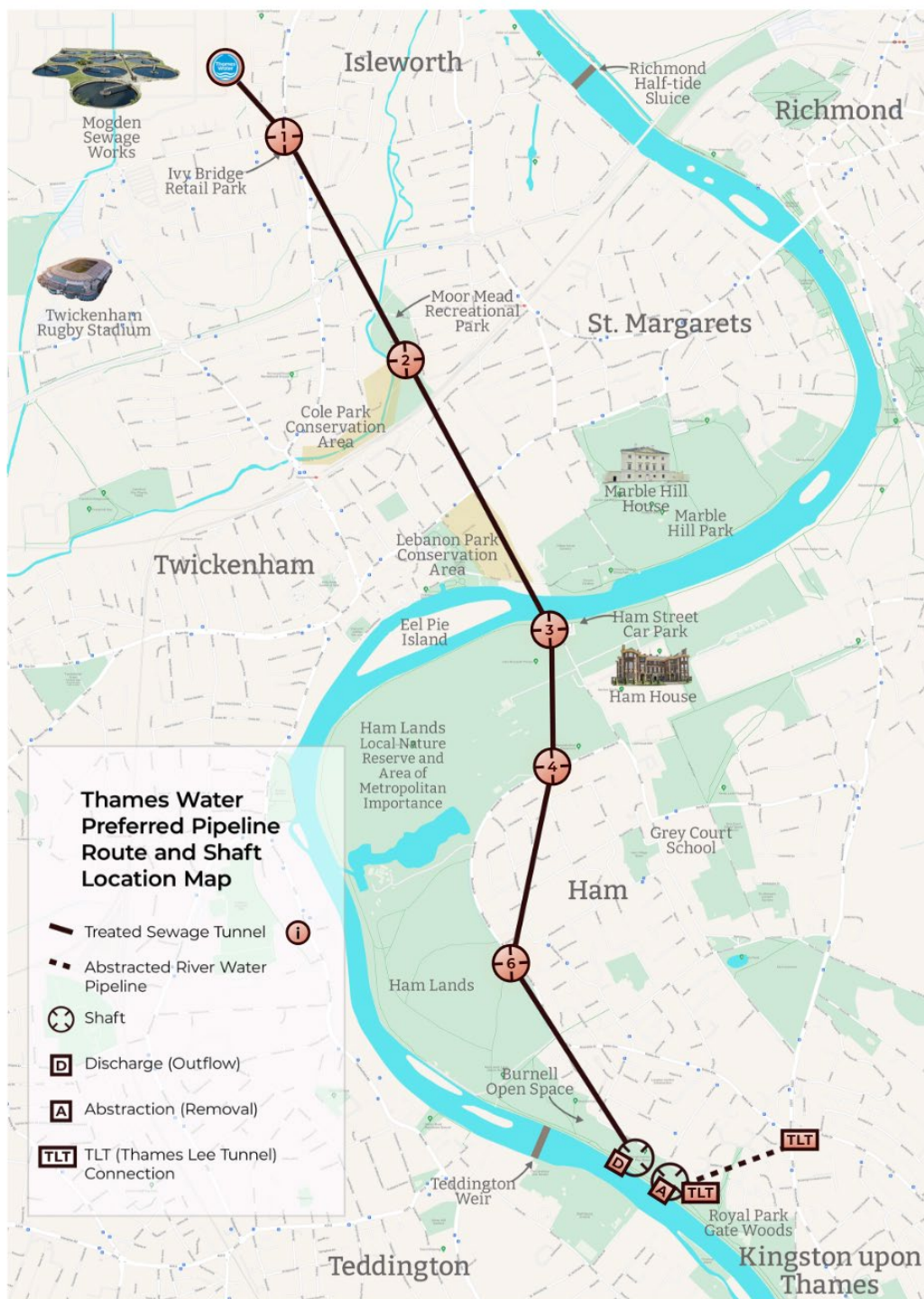


Figure 1: Thames Water TDRA Preferred route map.

## About SOLAR

Save Our Lands and River (SOLAR) has been engaged with TW since formation in May 2023 to represent the widespread and serious concerns about TW's proposed TDRA and oppose it in its entirety. The Campaign encourages TW to consider better, alternative drought resilience schemes. SOLAR is campaigning on behalf of the hundreds of thousands



of residents living in the proposed area affected by the TDRA scheme including Isleworth, St Margarets, Twickenham, Teddington, Ham, and North Kingston.

SOLAR's position has been one of opposition to the TDRA proposal in its entirety, and to research relevant information on the many dimensions of the proposal to facilitate meaningful interaction with TW after their failure to adequately inform and consult as required on their proposals for the TDRA throughout 2023. Community views of opposition, and increasingly of dismay, toward the proposal, have become even more embedded following TW's November "Information" events within the three affected boroughs.

To bring together the views of opposition of many local organisations, community groups, environmental groups, resident groups, and recreational groups, SOLAR proposed the Shared Statement of Opposition to TDRA in late summer 2023. The full list of groups endorsing SOLAR's Shared Statement of Opposition and the Shared Statement itself is set out on SOLAR's [website](#). In addition, over 30,000 people have signed the [Change.org petition](#) - *Stop the Abstraction Plant at Teddington Weir and Releasing Treated Sewage into the River*.

That Shared Statement of Opposition and list of endorsing organisations has now been submitted to those government organisations currently reviewing TW's resubmitted business plan for funding of further development of the TDRA proposal (i.e., Ofwat, The Environment Agency, and Defra -Minister for Environmental Quality and Resilience). We have stressed to these bodies that affected communities, TW's customers, genuinely believe there are/can be better, more acceptable, ways to meet the stated water supply requirements - less environmentally damaging, less costly, more acceptable, and more congruent with TW's stated values and objectives.

Dimensions of SOLAR's reach and support:

- SOLAR's e-newsletter is distributed to 867 individuals and groups across the area, with a very high open rate that ranges between 60-70%
- individual Local Updates reach 1,000 households
- the Statement of Opposition is now endorsed by over 100 organisations
- over 200 offers of volunteering support
- campaign event in September 2023 at the River involved over 500 people
- campaign event in November 2023 at Hawker Centre involved over 150 people
- tweets with video content typically get 10,000+ views
- tweets with pictures typically get between 500-2,000 impressions (views)
- content is viewed by thousands more users than SOLAR's 329 followers

## Requirement for scoping consultation

An early-stage requirement is the production of an EIA Scoping Report by TW. The Scoping Report will set out what TW intends to include and, as appropriate, exclude in its EIA. TW must consult certain stakeholders by statute on their EIA intentions but has discretion to involve others.

SOLAR had stated in writing an expectation of consultation (see Appendix v - email to Conor Loughney, 20/02/2024). This reasonable expectation was based on formal discussions on 6th December 2023 between members of SOLAR's Steering Group and acting TW CEO Cathryn Ross. Cathryn Ross expressly recognised SOLAR as the "community representative" given, amongst other reasons, that the Shared Statement of Opposition to TDRA promoted and reported on in the meeting had been proposed by SOLAR and at that point was formally endorsed by over 50 community organisations (100 now in May). However, TW have declared their intention to consult only those required by statute, including local authorities in formulating their Scoping Report and have specifically refused

to consult SOLAR (see Appendix vi - email from Conor Loughney, TW's Engagement Manager, 05/03/24 to Mike Pemberton).

To date, recognition of and reference to dimensions of environmental impact on social, community and health issues is largely absent from TW's research and public statements (e.g., Initial Environmental Assessment - Annex B5 etc. mentioned above in the "Summary"). Overcoming and drawing attention to this absence is a primary reason underlying SOLAR's desire for consultation on the Scoping terms of reference.

## SOLAR's community research to inform recommendations for TW's EIA

Since the beginning of 2024, we have been engaged with TDRA impacted communities to systematically develop scoping specification recommendations for input into TW's and other EIAs. This process is outlined below.

### Process for engaging impacted communities

With professional support, we have undertaken focus groups in impacted communities with residents and representatives of other local interest groups to identify:

- general dimensions of concern/value around social, community and health issues that should be included within EIA scoping;
- specific concerns relating to particular locations that should be recognised and captured within EIA scoping;
- baseline measures that could be integrated within resident surveys as part of TW's EIA to determine current use and value of impacted areas;
- measures that should be collected as part of TW's EIA to assess social, community and health impacts, both during construction and the long-term impacts of the proposed development.

The focus group discussions were summarised and subsequently circulated for comment/addition to a wider group local to the site concerned.

### Locations included within SOLAR's community research process

Consultation took place in the proximity of the following impacted areas:

<b>Impacted area</b>	<b>Location on map (Fig.1)</b>	<b>Details of proposed development</b>	<b>Details of consultation</b>
Burnell/Dysart Open Space	D; A	Location of abstraction and discharge facilities as well as transfer pipeline to Thames Lee Tunnel.	20 – 30 community representatives consulted.
Kingston North	A	Location of abstraction facility and transfer pipeline to Thames Lee Tunnel and connection shaft.	30+ community representatives consulted.
Thames water sports/recreational communities	Portion of the Thames adjacent to A and D	Recreational portion of the Thames adjacent to abstraction/discharge facilities; new cofferdams obstructions. Subject to water quality safety risks.	Water sports club leaders and representatives from the Lensbury consulted.

# Outcomes of community consultation: Recommendations for EIA Scoping

## Use and value of impacted spaces

To holistically ascertain the potential impacts of TDRA, it is necessary to understand how effected green and blue spaces are currently used and valued. These data are critical to understanding how change in use patterns and satisfaction/enjoyment will affect community health and wellbeing. Through our community consultation, we found that while all impacted spaces are heavily used for recreation, each is also unique in terms of the activities it supports and communities it serves. Below, we have broadly outlined the types of activities supported within each of the impacted spaces. We strongly recommend that as part their EIA, TW should undertake a representative survey in each impacted location to ascertain baseline use patterns (frequency of use and activities) and the many ways in which these green and blue spaces contribute to health and wellbeing. We have developed a set of example questions that could be used in this context (Appendix vii). Data should also be gathered from organised groups (e.g., clubs, school groups, community organisations) to more precisely determine use patterns, reliance on impacted spaces, and the number of residents who will be impacted.

### **Burnell/Dysart Open Space and North Kingston Site of Importance for Nature**

**Conservation (SINC):** These greenspaces designated as Metropolitan Open Space are the planned sites for the abstraction and discharge facilities as well as one outfall pipeline access shaft and two extraction shafts. They are heavily used and support a wide range of recreational pursuits. They are particularly valued as a safe amenity for daily recreation including by many children and families for after school recreation and during school holidays for football, cricket, other sports/games, playground activities, picnics, and other family gatherings. They are also regularly visited for running and other exercise close to home and have been increasingly well used daily following the shift to work from home. The recreational opportunities these spaces provide are particularly important for elderly local residents and those who don't have their own transport. Several organised events also take place within these greenspaces on a regular basis including Kingston Park Run, charity events, and Thames trail walks. They are also recognised and regulated areas for dog walkers.

**Thames Path national trail:** The planned site for the abstraction and discharge facilities is along the Thames Path national trail (towpath) and Ham lands route, a key link for Thames Landscape Strategy's open green spaces and used by thousands of people to visit, commute, and relax between Kingston, Ham, Teddington, and Richmond. Many thousands of people participate in sport - organised and individually (football, running, cycling, sailing canoeing and swimming) in the green corridor between these three areas. This path has seen a significant increase in users in the last eight years or so after its rejuvenation across Burnell/Dysart Open Space following an effective family no-go status for anti-social activity by illegal riverbank mooring. The movement of people between these areas is significant and supports the local economy.

**Thames river users:** The portion of the Thames adjacent to the planned abstraction and discharge facilities is a highly valued local resource, supporting a wide range of water-based recreational activities and highly valued for the full range of river wildlife it supports. It is extensively used on a daily basis for, among other pursuits, swimming, kayaking, rowing, boating, and paddleboarding, including by a range of organised groups. Notably, it is extensively used by young recreational groups for learning and early river experiences eg capsizing drill. Many commercial vessels such as barges and pleasure cruisers also pass through this portion of the Thames.



## Dimensions of social impact

Residents are very concerned that, to date, TW has not presented a sufficient level of detail to ascertain the true social impacts of TDRA. At this point in time all aspects of the scheme should be “scoped in” (included) in the EIA. At the very least, our consultation indicates that the following impact dimensions should be holistically included in the scope of the TDRA EIA, along with proposed mitigation measures. The EIA should cover both short-term (construction phase) and long-term impacts related to each of these dimensions. Under each impact dimension, we have identified a range of potential impacts that will be uniquely experienced within specific locales and should be incorporated within the EIA. A previously mentioned, this commentary relating to features of TDRA is based on the TW reports identified in the “Summary” section of this report.

### Loss of access to green and blue space during construction

- Based on the plans proposed by TW, it is anticipated that the construction of the access shafts, the abstraction facility, and the discharge facility will make the surrounding greenspaces effectively unusable during the construction period, or at the very least significantly reduce the area available for recreation. The portion of the Thames adjacent to the abstraction facility and discharge facilities will similarly become unusable during this time. TW has projected that the construction phase will take approximately 24 months for Tertiary Treatment Plant at Mogden sewage works, 21 months for the abstraction and discharge plants on the river, and 6-9 months per shaft and pipeline connection. Public reception of these estimates however is sceptical given the expectation of construction project overruns and TW's perceived poor reputation for project management. The EIA must fully assess the impact of “cutting off” usage of impacted green and blue space during construction.
- Fresh air, exercise, and accessible open space have been widely demonstrated as vital for physical and mental wellbeing and, as such, having no/limited access to green/blue space during the construction phase could be extremely detrimental to the health and wellbeing of residents. This is particularly true for residents from disadvantaged communities who are less likely to be able to afford transport and/or membership to alternative venues and facilities. The EIA should, therefore, document the availability of alternative green and blue spaces for recreation. We strongly recommend gathering this information directly from residents (e.g., through a survey) rather than through objective assessment (e.g., using GIS mapping) as it is only through resident perceptions that accessibility can be holistically assessed. For example, an alternative space might be geographically available, but resident perspectives are needed to determine if it is safe, has the necessary amenities, etc. We have developed a suite of example questions that could be included in a survey to ascertain availability of alternative greenspace for residents (Appendix viii).
- The closure of the impacted spaces during construction is also likely to severely impact organised groups. In particular, this closure poses a significant risk to the long-term survival of groups required to relocate, if possible, during the construction period. Indeed, such relocation will not be possible in many cases. The EIA should provide organised groups (e.g., organisations, clubs, community groups, schools, and businesses) the opportunity to submit impact statements in which they could identify the impact closure of the space would have on their operations in the short and long term.
- The EIA must also consider how closure of the spaces will impact the local culture as these spaces present shared unifying features. Loss of access during construction could fracture community dynamics and reduce residents' sense of place and commitment to the area. The aforementioned questions identifying the values associated with each impacted space (Appendix vii) will provide a sense of the magnitude of community disruption should be impacted spaces be closed.

## Landscape alterations

- TW's EIA should include thorough and accurate projections (including visuals) of how TDRA will alter the landscape (physically and visually), natural habitats (quality, type, availability), and amenities within impacted areas. The EIA must clearly describe all structures which are proposed as part of TDRA, including their size, function, usage, noise, maintenance impacts, etc. The details must also include any ancillary structures. In their "consultation 2023" documents, TW refers to several "above ground" structures related to the abstraction and discharge facilities without describing them which is very concerning. TW has also failed to provide any information on ancillary structures such as lighting, fences, generators, access tracks for ongoing monitoring and maintenance, new electrical supply structures, etc. All structures and their impacts must be described and visualised in detail. Restoration of the natural habitat in all impacted spaces to current quality and amenity must also be considered; this restoration of woodland and other natural habitats should be described in detail and with certainty. Currently, TW state that mitigation of damage is possible by means of offsite gain. This attitude is not acceptable and a requirement for onsite improvement must be clear. The level of detail in the EIA must demonstrate the true impact.
- Residents are extremely concerned that the natural character of the riverside will be destroyed in the locations of the abstraction and discharge structures (and cofferdam during construction), resulting in permanent landscape transformation. Many of the structures that TDRA entails are crowded into one area which is likely to severely impact the availability and quality of Burnell//Dysart Open Space and Kingston North SINC for recreation and significantly detract from Broom Water Conservation Area's visual amenities. Indeed, TDRA's IEA Annex B5 states that "The most severe impact of the proposed (TDRA) development on landscape/townscape and visual receptors is considered to be from the construction and operation of the Teddington abstraction intake structure, which will impact on the local character and the visual amenity of the local community and recreational users. The construction of the Teddington outfall structure is also considered to have a large impact on the local character and visual amenity of the local community and recreational users. These construction activities will impact the same receptors, which may increase the severity." The "receptors" described here are residents of Dysart Avenue, Royal Park Gate (Northweald Lane), Burnell Avenue and Broom water and will also include those people who use the towpath and the river and the green spaces. Landscape alterations could severely impact enjoyment and use of impacted areas. For example, they could result in the loss of natural open space and woodland regularly used by schools for educational purposes.
- Residents are also concerned about the long-term impacts of the construction and maintenance of the access shafts. For example, groundwork associated with the construction and ongoing maintenance of the shafts (e.g., heavy vehicular usage, access tracks for ongoing monitoring and maintenance) is likely to severely damage the natural character of these spaces (e.g., grassland, woodland) which could take years to recover. Additionally, creation and removal of the very large construction support site will cause major damage to the quality of playing space which would similarly take years to recoup. There are also concerns that the presence of monitoring "kiosks" and shaft covers/safety fencing will break up the currently heavily used recreational areas.

## Water quality

- Residents reported major concerns in relation to how treated effluent will impact water quality and, therefore, safety for recreational use, given years of mismanagement and deliberate breaches of legal standards, together with lack of Environment Agency enforcement. The proposed system requires the volume of treated effluent pumped into river to be 2.5 times greater than water taken out (although the abstraction plant will only

operate for five summer months once every 2 to 3 years, the treated effluent outfall into the river will operate at 25% capacity 24/7 every day of every year when not in full operation). Nothing has been published which proves that pumping these volumes of treated effluent into the river will cause no deterioration to water quality or other harms. The impact of discharged treated effluent on water quality and the associated health risks in this heavily used river area is a major issue. TW's lack of communication on standards of discharged treated effluent to deal with "forever chemicals", PFA's and pharmaceuticals for example is unacceptable and very serious absence given the exposure, particularly of the young, to these waters for generations to come. The EIA must provide detailed and scientifically sound information on how the treated effluent will impact water quality.

- The potential impact of TDRA on water quality is particularly concerning given the dozens of residents who currently recreate daily in the river at the exact location of the effluent release (with even higher number of users in summer peaks). (Details of major water quality threats and issues associated with treated effluent discharge into the river are dealt with in SOLAR's accompanying study "TDRA Water Ecology Impact Review." This includes open-water swimmers, kayakers, rowers, and paddleboarders, including many young kayakers who perform capsizing drills at this location. Reductions in water quality would significantly change or potentially completely destroy this heavily used recreational amenity.
- The phenomenon of "back flow" when high tides overflow the weir and push water upstream will cause treated effluent to be carried upstream to and past the abstraction facility and further into heavily used recreational waters.
- The EIA should also describe the likelihood of spillage of harmful materials and chemicals into the river (e.g., from construction and maintenance of abstraction and discharge facilities and cofferdam) and mitigation measures that will be in place. For example, high tide "back flows" will push construction debris back upstream of the abstraction and discharge locations, presenting a hazard to recreational river users.

#### Flood risk

- The EIA should include a detailed hydrological assessment to determine the added flood risk brought about by the abstraction plant and cofferdams. The EIA needs to take into account the occasional "back flow" when tidal flow pushes water back upstream. Furthermore, the assessment should account for variation in the flow of the river throughout the year.
- Additionally, the access shaft locations, intake, and kiosks in KT2 are all in Flood Zones 2 or 3. There is the potential for construction compaction and hardscaping to increase the flood risk in this area.

#### Noise, light, and air pollution

- The EIA must fully describe noise, light, and air pollution resulting from TDRA. Consideration must be given to individual and community anxieties and health impacts given the prolonged proximity of construction and environmental intrusion.
- The EIA must consider fully the scale of construction and the significant impact this will have on many residents for an extended period. Residents are concerned about the likely two-years of high construction noise and light levels and deterioration of air quality at all impacted sights which they expect will be in 24hr operation. For example, the construction of the cofferdam will likely result in high-level percussive noises for long periods. High noise and light levels will make some activities impossible and reduce safety for others (e.g., reduce attentiveness of young children engaged in team sports). Use and enjoyment of outdoor space in these areas is thus likely to be severely impacted. Furthermore, construction will take place very close to residential properties in

many cases, thus severely impacting residents in their homes. For example, the access shaft location for the Thames Lee Tunnel in Royal Park Gate woods will be less than 20 metres from some residential property and less than 40m from others at Northweald Lane. There are also likely to be added light pollution from the navigation of river vessels to avoid abstraction and outfall plant work.

- The EIA must also fully document any ongoing noise, light, and air pollution resulting from operating the abstraction and discharge facilities, as well as from the maintenance of all facilities. Residences are particularly concerned that the abstraction plant will result in permanent intrusion of long-term noise into surrounding residential areas.

#### Changes in traffic patterns

- The EIA must describe in much more detail the construction machinery that may be used and the mitigation that will be put in place to protect the health of residents and the fabric of their properties. It is not enough to state that mitigation “may” be needed, or screening might be considered. Residents are concerned that TDRA will result in very heavy additional local road usage by HGVs for construction and multiple site servicing. For example, construction of each access shaft may require 26 HGVs a day over an 8-month period. There are a limited number of access roads to proposed building sites which are already heavily used by residents and visitors. As such, TDRA is expected to cause major deterioration of road capacity in already congested and bottlenecked Richmond/Kingston local road network. Ham Parade business could be particularly affected by this.
- There are also severe safety implications of increased road congestion, in particular from drivers unfamiliar with the area. Currently, reasonable care is generally taken by road users adjacent to the impacted greenspaces, themselves predominantly residents who are familiar with cautions for family/children/elderly usage.
- The EIA must also describe impacts and mitigation measures that will be in place to account for the massive increase in pressure for parking by contractors/staff of construction activities.

#### Additional safety risks from the abstraction facility

- The EIA must fully document any potential ongoing safety risks from building and operating the abstraction and discharge facilities.
- There are concerns that drawing water through the grilling could present a danger for recreational users of the Thames, in particular the young who regularly capsize and swim in the area of the river directly adjacent to the abstraction facilities.
- There are also concerns that the large cofferdams built into river for construction of abstraction and discharge facilities will result in serious river user/navigation restrictions (recreational and commercial) during the construction/commissioning phase. The cofferdams (and their construction) will narrow the river and increase navigation risk in summer with the high level of up and down boat movements given this is near the lock that has a large volume of boats coming upriver at lock opening points.

#### Access points

- The EIA must fully describe the ways in which TDRA will impact access points surrounding affected areas and the knock-on effects for residents, in particular those who are mobility impaired. Mitigation measures must be described.
- Residents are concerned that the construction of the abstraction and discharge facilities will severely restrict normal access to the river and Thames towpath for recreational purposes. Redirection of the Thames Path National Trail will be required.

- Residents are also worried about how permanent access roads required for ongoing maintenance of new facilities will affect access and break up heavily used recreational areas.
- Diversion of large numbers of walkers, cyclists and recreational joggers into Royal Park Gate will result in significant disruption to existing residents if diversions are not clear.

#### Property damage due to pipejacking

- The proposed tunnels will be going under conservation areas with buildings that are already subject to subsidence. Many people in the areas of the conveyance route and the construction have registered concern about the impact of pipejacking under their houses and the impact of shaft construction vibration on their properties. These potential impacts must be fully documented in the EIA.

#### Anti-social behaviour

- The EIA should consider and mitigate for potential rises in anti-social behaviour during construction when there will be significantly less footfall in impacted recreational areas. The EIA should also describe any anticipated rise in anti-social behaviour due to the addition of new facilities.

#### Conflict/overlap with other development plans in impacted areas

- TW should be aware of and mitigate for any planned/ongoing development in impacted areas that will overlap with TDRA. For example, a major housing redevelopment is planned for a large area close to Riverside Drive and the construction of Shaft 4.

#### Long-term changes in recreational use patterns

- TW must provide residents with a full and detailed account (including visuals) of long-term change that will result from TDRA. This includes changes to landscapes (including added primary and ancillary structures), natural habitats (quality, type, availability), available amenities, ongoing noise/light/air pollution, safety, access, and water quality. Residents and community groups must be given the opportunity to comment on how these changes will impact their enjoyment and use of effected recreational spaces.



## Appendices

Appendix i: Letter raising concerns about TDRA from the Chair of British Rowing to the Chief Executive of the Environment Agency



Mr Philip Duffy  
Chief Executive Officer  
Environment Agency Head Office  
Horizon House  
Bristol.  
BS1 5AH

8<sup>th</sup> March 2024

Dear Mr. Duffy

I am writing to you with regard to Thames Water's proposed Teddington Direct River Abstraction scheme which I understand requires both a new treated sewage facility and new abstraction facility on the Teddington/ Hampton stretch of the Thames.

Our local rowing clubs closest to the sites of these proposed facilities (on both the tidal and non-tidal sections of the Thames) have expressed considerable concern about what is being suggested. The potential impact is significant, both in terms of the social, recreational and environmental impacts, and bearing in mind the 3-year construction plan.

I understand that, as yet, there has been no formal environmental or social impact assessment for the scheme (despite these proposals being included in Thames Water's business plan), and neither has there been a wider public consultation. I will not rehearse all the arguments here, but I am aware of them from SOLAR's letter to you of 14<sup>th</sup> February which is published on their website. I fully endorse the case they are making.

I would therefore ask you to make clear to Thames Water that British Rowing will strongly support our clubs in their efforts to encourage a reconsideration of the current proposals. It seems clear that there are better alternatives to what is being proposed that have much less impact on the unique national asset that is the River Thames and its surrounding lands. Our members will be significantly impacted by what is being suggested, and I would encourage all efforts that look to unlock the better choices that exist.

Yours sincerely

Mark Davies  
Chair, British Rowing

Appendix ii: Letter raising concerns about TDRA from the Chief Executive of Paddle UK to the Chief Executive of the Environment Agency



Mr Philip Duffy  
Chief Executive Officer  
Environment Agency Head Office  
Horizon House  
Bristol  
BS1 5AH  
05 April 2024

Dear Mr Duffy

**Re: Thames Water, Teddington Direct River Abstraction**

Paddle UK is the National Governing Body for paddlesports in the UK and the membership body for England. We are committed to protecting the special places we paddle, ensuring that our community can enjoy clean, nature rich blue environments.

I am writing to you on behalf of our community, to raise serious concerns regarding Thames Water's proposed 'Teddington Direct River Abstraction Scheme'. In particular regarding treated recycled water being removed from Mogden Sewage treatment works and discharged into the Teddington stretch of the Thames.

We believe that this scheme poses a significant threat to public health as well as the natural environment. As such, the interests of members, our local paddling clubs and delivery partners based along the River Thames will be severely impacted.

Information regarding the scheme on Thames Water's website highlights mitigations to reduce the impact on the environment with ongoing assessments in place. There is no reference to any assessments on the impacts the scheme will have on public health. We believe that the release of these discharges into the watercourse may increase levels of bacteria, viruses and parasites that are harmful to humans.

Given that this section of waterway is heavily used by recreational groups, Paddle UK alongside other watersport interests such as Rowing, is urging Thames Water to undertake a detailed assessment of the public health impact of discharging treated effluent into the watercourse before a final decision is taken to apply for planning permission.

Yours sincerely

Ashley Metcalfe

A handwritten signature in black ink, appearing to read "Ashley Metcalfe".

Chief Executive, Paddle UK

**Paddle UK, Adbolton Lane, Holme Pierrepont, Nottingham NG12 2LU**  
0300 0119 500 | [www.paddleuk.org.uk](http://www.paddleuk.org.uk) | [hello@paddleuk.org.uk](mailto:hello@paddleuk.org.uk)

### Appendix iii: Details of access shaft and pipeline proposals

Each access shaft will require a construction compound of up to 2,500 square metres. (About 12 standard tennis courts side-by-side.). During the construction of these shafts, land will be inaccessible to public use. The shaft sites will be active construction areas for up to 8 months each. Each shaft may need 26 HGVs (Heavy Goods Vehicles) daily (averaged over the 8-month period). There may be 24-hour working for some of the tunnelling.

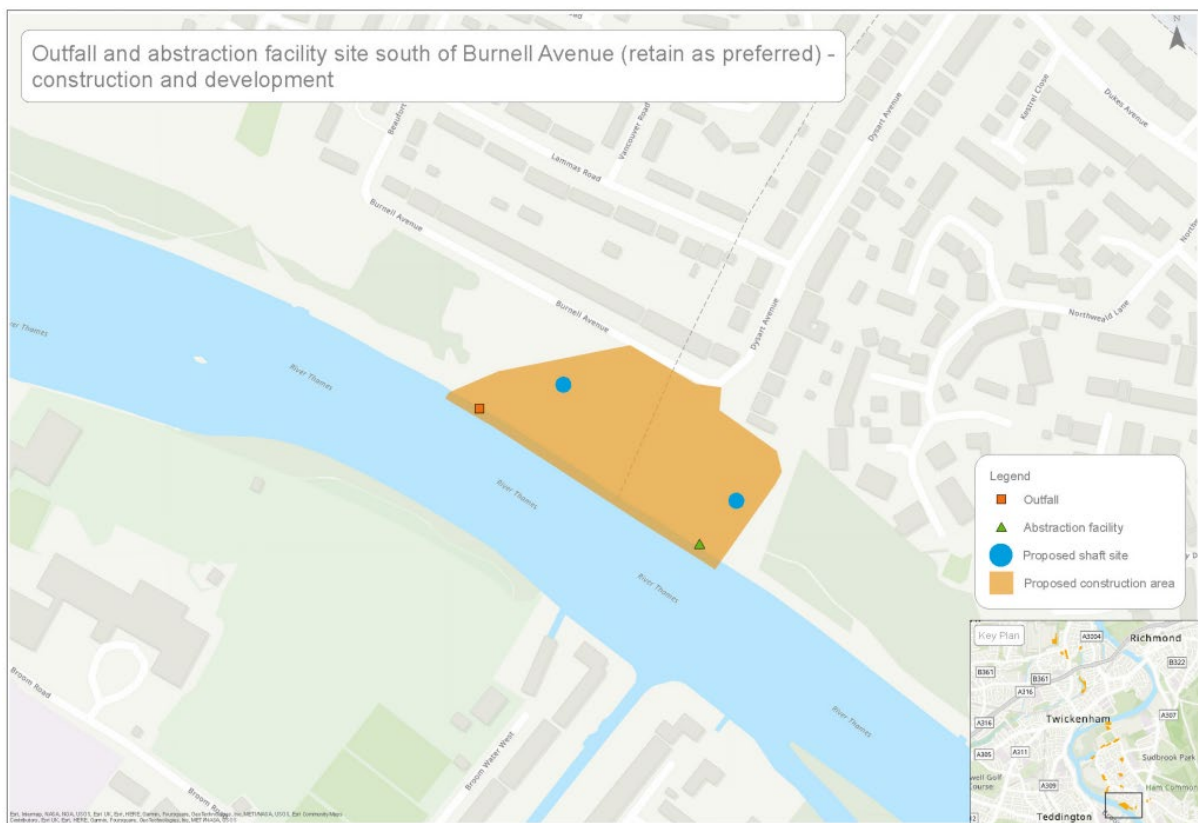
Once complete, each shaft location will have an area of about 10.5m capped with a concrete cover. That shaft concrete cover would be permanent just below the ground surface. There would be two ground surface access covers measuring approximately 2m x 2m each (4m squared) for access. All shafts must be accessible to Thames Water for maintenance so that land use can never change.

The Burnell//Dysart Open Space and North Kingston site will be active for at least 21 months. This is because this will also be the site of construction of the discharge and abstraction facilities. A pipeline is required to take the abstracted water from the abstraction facility to the existing Thames Lee Tunnel (TLT). Two shafts are required for the abstracted water pipeline. The first will be near the abstraction facility in Burnell/Dysart Open Space. The second will be a Thames Lee Tunnel (TLT) connection. There are two options for the TLT connection: Park Gate woods (destroying areas of trees and wildlife habitat) or Tudor Drive junction (where there is a "pocket park"). A pipejacked tunnel under Royal Gate Park Estate would be needed for the Tudor Drive option. It is not known what kind of pipeline works would be used for the Royal Park Gate woods option.

## Appendix iv: Details of abstraction and discharge facility proposals

A new abstraction facility will be built on the towpath of Burnell//Dysart Open Space, and a new abstracted water pipeline shaft will be built a short distance away. The abstraction facility is likely to measure approximately 38m long and 3m to 4m in height above normal water level. The intake structure could be partially set into the riverbank and extend into the river by up to 3m. Thames Water indicates it will take 21 months to build this abstraction facility. This plant will require construction of a cofferdam 40m long, 20m into the riverbank and 10m out into the river from the riverbank with the attendant obstruction and hazard to navigation and recreation in the river, and potential addition flood risk to the Broom Water Conservation Area opposite, already with the highest risk designation Flood Zone 3A. The abstracted water would be removed to Lee Valley reservoirs in north London. Thames Water has said this will only be during periods of drought. In periods of drought, the river will be at its most stressed, and the possibility of ecological harm is ever present.

The Discharge facility will be built on the riverside of Burnell/Dysart Open Space. In a drought, millions of litres of treated effluent will be pumped into the river from the discharge facility. The requirement for continuous operation of the tertiary treatment plant at Mogden sewage works will effectively mean that 2.5 times as much treated effluent will be discharged into the river as water abstracted out.



Appendix v: Email from SOLAR to Conor Loughney, Thame Water's Engagement Manager, 20/02/24 in response to his of 16/02/24

From: Mike Pemberton <[pemberton.mw@gmail.com](mailto:pemberton.mw@gmail.com)>  
Sent: Tuesday, February 20, 2024 14:51  
To: Conor Loughney <[Conor.Loughney@thameswater.co.uk](mailto:Conor.Loughney@thameswater.co.uk)>  
Cc: Ian McNuff <[ian\\_mcnuff@hotmail.com](mailto:ian_mcnuff@hotmail.com)>  
Subject: Re: TDRA - EIA Timeplan

Hello Conor,

In response to your question re EIA Scoping report, yes I am.

In the context of Cathryn Ross' acknowledgement of SOLAR as community representative at the December meeting I am sure you are expecting to consult SOLAR and it is of course also important for us to know when you plan to complete such consultations, thanks.

I understand that as part of pre-application consultation requirements Thames Water is required to prepare a Statement of Community Consultation (SoCC) regarding how the local community will be consulted and I would appreciate a copy please.

Many thanks

Mike

**On Fri, Feb 16, 2024 at 9:39 AM Conor Loughney**  
**<[Conor.Loughney@thameswater.co.uk](mailto:Conor.Loughney@thameswater.co.uk)> wrote:**

Dear Mike,

For clarification, are you asking how SOLAR can influence the EIA Scoping Report that Thames Water is going to produce, before we send it to the planning inspectorate?

Many thanks,

**Conor Loughney**

Engagement Manager

[Conor.Loughney@thameswater.co.uk](mailto:Conor.Loughney@thameswater.co.uk)



Appendix vi: Email from Conor Loughney, Thame Water's Engagement Manager, 05/03/24 to Mike Pemberton

From: **Conor Loughney** <[Conor.Loughney@thameswater.co.uk](mailto:Conor.Loughney@thameswater.co.uk)>

Date: Tue, Mar 5, 2024 at 12:15 PM

Subject: Re: TDRA - EIA Timeplan

To: Mike Pemberton <[pemberton.mw@gmail.com](mailto:pemberton.mw@gmail.com)>

Cc: Ian McNuff <[ian\\_mcnuff@hotmail.com](mailto:ian_mcnuff@hotmail.com)>

Dear Mike,

Thank you for your query about SOLaR's involvement in the Environment Impact Assessment (EIA) scoping process.

As we work through the process of preparing our EIA Scoping Report in readiness for submission to the Planning Inspectorate ('PINS') later this year, we will be liaising with the relevant statutory consultation bodies who will in turn then be consulted by PINS once the document has been formally submitted.

The purpose of that liaison will be to explore specific components of the Scoping Report from their position both as statutory consultee and also relevant authorities with a defined technical remit to advise on the approach and method to be taken when addressing particular areas of environmental assessment. Feedback through those discussions will help inform the final content of the Scoping Report, which those statutory consultees will then review in detail when consulted on that final submitted copy by PINS.

Accordingly, we will not be opening the EIA Scoping Report drafting process any wider than as described above and so will not be inviting comments on its content from SOLaR or other local community consultees. This approach is consistent with advice provided on the 'Frequently Asked Questions' available within PINS's website in respect of the EIA Scoping process, which explains (see also: <https://infrastructure.planninginspectorate.gov.uk/application-process/frequently-asked-questions/scoping-process-faq/> );

## **6. Can I comment on the scoping request?**

*Only the consultation bodies identified above (\*) will be invited to comment on the Applicant's scoping request or be included within the SOS' Scoping Opinion. However, separately as part of the Applicant's Pre-application consultation duties a Statement of Community Consultation (SoCC) will be prepared setting out how the local community will be consulted about the Proposed Development. As the project is EIA development and requires an ES to be submitted, the SoCC will set out how the Applicant intends to publicise and consult on Preliminary Environmental Information about the likely significant effects of the project. It is therefore at this stage that individuals and bodies who were not invited to comment on the scoping request will have the ability to provide comments on environmental information relating to the Proposed Development.*

(\*) Those consultation bodies being identified as set out below:

## **5. What consultation is undertaken on the scoping request?**

*Before adopting a Scoping Opinion the Inspectorate must, under Regulation 10(6) of the EIA Regulations, consult the relevant 'consultation bodies' defined in the EIA Regulations as the following:*

### **5.1. Prescribed consultation bodies**

*These are the bodies identified in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the APFP Regulations), including Statutory Undertakers’.*

*Statutory Undertakers are defined in Schedule 1 of the APFP Regulations as having the same meaning as in s127 of the Planning Act 2008 (the PA2008), which defines statutory undertakers as:*

*having the meaning given by s8 of the Acquisition of Land Act 1981 (the ALA), which are Statutory Undertakers in specified sectors;*

*those deemed to be Statutory Undertakers for the purposes of the ALA, by virtue of another enactment; and*

*those that are Statutory Undertakers for the purposes of s16(1) and (2) of the ALA, which are specified health bodies.*

*The Inspectorate must either consult prescribed bodies in all cases or has discretion in deciding which bodies should be consulted by adopting a ‘relevance test’ and/ or by deciding whether certain circumstances apply, as set out in Schedule 1 of the APFP Regulations.*

## **5.2. Local authorities**

*These are defined in section 43 of the PA2008 in terms of whether they fall within the categories of an ‘A’, ‘B’, ‘C’ or ‘D’ local authority:*

*‘A’ is a neighbouring local authority (s43(3)) that shares a boundary with a ‘B’ host authority;*

*‘B’ is either a unitary council or a lower-tier district council in which the Proposed Development and any Associated Development is situated (a host authority);*

*‘C’ is an upper-tier county council in which the Proposed Development is situated (a host authority); and*

*‘D’ is a neighbouring local authority (s43(3)) which is not a lower-tier district council and shares a boundary with a ‘C’ authority.*

## **5.3. The Greater London Authority**

*If the land to which the application relates is in Greater London, the Inspectorate must consult the Greater London Authority.*

*The Inspectorate has also identified a number of bodies which are not defined as consultation bodies under the EIA Regulations, but have relevant functions and responsibilities which are akin to other consultation bodies. The Inspectorate will exercise judgment and may on a discretionary and non-statutory basis consult with these bodies on the information to be included in an ES. Such bodies are identified in the Inspectorate’s Advice Note Three.*

*In accordance with Regulation 10(11) of the EIA Regulations, the consultation bodies have 28 days from receipt of the Inspectorate’s correspondence to respond to the consultation.*

*Responses received after the 28 day deadline will not be considered within the SoS’s Scoping Opinion; the Inspectorate is entitled to assume that the consultation body in question does not have any comments on the information to be provided in the ES or the updated ES.*

Consistent with FAQ 6, we will be preparing a Statement of Community Consultation (SoCC) as part of the pre-application process, which will set out how we plan to involve all statutory and non-statutory consultees, and the local community in the review of our Preliminary Environmental Information. As part of developing the content of our SoCC we would like to

engage with SOLaR, and other interested community groups, to seek views on the provisions that we should be including within the SoCC, before a draft of the SoCC is issued to the Local Planning Authorities under the provisions of the Planning Act 2008 for their formal review and comment. If this is of interest to SOLaR we would be pleased to discuss this further and make suitable arrangements to facilitate that discussion.

In addition to the above, as part of our ongoing engagement with the local community, we are planning to reinvigorate the River Forum. Through this forum, we want to involve wider representation from within the local community and it would be helpful to discuss with SOLaR representatives how this group could be most effective. If you would like to be involved in supporting the development of a Terms of Reference and format of a new community forum, we can arrange a meeting to discuss at a convenient time for you.

Kind regards,

**Conor Loughney**  
Engagement Manager

[Conor.Loughney@thameswater.co.uk](mailto:Conor.Loughney@thameswater.co.uk)

Thames Water Utilities Limited, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Appendix vii: Example survey questions that could be used as part of a resident survey to gather baseline data on use patterns and value associated with impacted spaces.

**A) Frequency of use:** This information could be collected through a simple Likart scale question such as in the following example:

<b><i>How often do you use [name of impacted green/blue space]?</i></b>
Multiple times a day
Once a day
A few times a week
Once a week
A few times a month
A few times a year
Never use this space

**B) Activities:** The spaces that will be impacted by TDRA involve a wide variety of activities. These activities are broadly captured through the following example:

<b><i>In what ways do you use [name of impacted green/blue space]? (check all that apply)</i></b>
Informal exercise – land-based (e.g., walking, running, playing sports)
Informal exercise – water-based (e.g., swimming, kayaking, boating, paddleboarding)
Organised exercise – land-based (e.g., Park Run, litter picking, charity events, group exercise class, organised sport)
Organised exercise – water-based (e.g., kayaking courses, swimming groups)
Informal gatherings (e.g., picnics)
Relaxing
Viewing nature
Dog walking
Using a children’s play area

**C) Health and wellbeing benefits:** The impacted green and blue spaces contribute to the health of residents in many ways. These are captured in the following example Likart scale question and open-ended follow up question:

<b><i>Please indicate how important [name of impacted green/blue space] is for the following aspects of your health and wellbeing?</i></b>					
	Essential	Very important	Somewhat important	Not very important	Not at all important
Physical health					
Mental health					
Socialising with friends & family					
Connection to my community					
Nature connection					
Spirituality					

<b><i>Please add any additional detail on how [name of impacted green/blue space] contributes to your health and wellbeing:</i></b>	Open ended.
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**D) Income:** Many individuals' livelihoods rely, to varying extents, on the impacted spaces. This should be captured within the EIA as in the following simple, open-ended question.

<b><i>Does your livelihood depend on [name of impacted green/blue space] in any way (e.g., dog walker, host group exercise classes, run organised sporting events)? Please describe.</i></b>	Open ended.
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Appendix viii: Example survey questions that could be used as part of a resident survey to ascertain availability of alternative green and blue space for residents.

**A) Distance to the green/blue space that will be closed during construction:** In his 2021 manifesto the Mayor pledged to '[improve London's network of green corridors and open spaces so that more Londoners live within a 10-minute walk of green space](#)' as this distance has been strongly linked to likelihood of green space use. Gathering baseline data on the distance survey participants live from the impacted spaces is thus critical to understanding whether they will have an alternative space in which to undertake their preferred activities. For example, see the example question below:

<b><i>How long does it take you to walk/wheel to [name of impacted green/blue space] from your home?</i></b>
Less than 5min
5-10min
11-20min
Over 20min

**B) Availability of alternative space:** The following question will provide an understanding of whether residents have a suitable alternative greenspace in which to undertake their preferred activities during the construction phase.

<b><i>Are there any other green/blue spaces closer or the same distance from your home as [name of impacted green/blue space] that you could safely use for the following activities?</i></b>	
Informal exercise – land-based (e.g., walking, running, playing sports)	Y/N
Informal exercise – water-based (e.g., swimming, kayaking, boating, paddleboarding)	Y/N
Organised exercise – land-based (e.g., Park Run, litter picking, charity events, group exercise class, organised sport)	Y/N
Organised exercise – water-based (e.g., kayaking courses, swimming groups)	Y/N
Informal gatherings (e.g., picnics)	Y/N
Relaxing	Y/N
Viewing nature	Y/N
Dog walking	Y/N
Using a children's play area	Y/N

**C) Access to garden:** This simple Y/N question will provide detail on respondent's access to private greenspace during the construction period.

<b><i>Do you have access to a garden?</i></b>	Y/N
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**D) Additional impacts:** This open-ended question will allow residents the opportunity to add additional detail relating to how the closure of green/blue space will affect their health and wellbeing.

<b><i>Please describe how, if at all, your health and wellbeing would be impacted if [name of impacted green/blue space] was closed for 2 years.</i></b>	Open-ended
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