



Teddington Direct River Abstraction

Preliminary Environmental Information Report
Chapter 4 – Approach to Environmental Assessment

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4. Approach to Environmental Assessment

4.1 Introduction

- 4.1.1 The purpose of the Environmental Impact Assessment (EIA) is to protect the environment by ensuring that decision makers when deciding whether to grant consent for a project which is likely to have significant effects on the environment, do so in the full knowledge of the likely effects and take this into account in the decision-making process (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, 2020).
- 4.1.2 The EIA process is described as a tool to aid '*the systematic identification, prediction and evaluation of impacts*' (Sadler and Fuller, 2002). There are three main EIA documents produced as part of the pre-application and application process for developments requiring development consent under the Planning Act 2008 (as amended). These are:
- Scoping Report: The Scoping Report sets out the likely significant effects from a project. It also presents the data collected and the proposed assessment methodology and approach that will be used during the EIA. The Scoping Report is issued to consultees for comment on the scope and methodology proposed
 - Preliminary Environmental Information (PEI) Report: The PEI Report sets out the information that 'is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development' (The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations')). The PEI Report is used by consultees to inform their consultation responses during the statutory consultation
 - Environmental Statement (ES): The ES presents the results of the EIA undertaken. It identifies the likely significant effects that would result if the Teddington Direct River Abstraction Project (hereafter referred to as 'the Project') was implemented, and any proposed mitigation to reduce those significant effects. The ES is submitted as part of the application for development consent and is considered during the decision-making process

4.2 Relevant experience

- 4.2.1 The PEI Report has been produced by a large number of people with experience in their relevant aspects. The relevant qualification(s) and accreditation(s) of the personnel leading on the different environmental aspects are as follows:
- EIA lead – BSc; CEnv MIEMA
 - Water Resources – MSc; BSc; CSci; FGS
 - Flood Risk Assessment – BSc; C.WEM
 - Aquatic Ecology – BSc; CBiol; MIMarEST

- e. Terrestrial Ecology – MSc; BSc; CEnv; MCIEEM
- f. Historic Environment – MSc; BSc; MCIfA
- g. Townscape and Visual – MA; CMLI
- h. Ground Conditions and Contaminated Land – BSc; CGeol (Chartered Geologist)
- i. Materials and Waste – BSc; CIWM
- j. Traffic and Transport – BSc; MCIHT; TPS
- k. Air Quality – BSc; MEnvSc; MIAQM
- l. Noise and Vibration – BSc; PgDip; MIOA
- m. Socioeconomics, Community, Access and Recreation – MA Honours CEnv; MIEMA
- n. Human Health – MSc; BSc; CEnv
- o. Carbon – BEng, MSc, MEnvSci, CEnv
- p. Climate Change – BSc; MSc; CEnv; MEnvSc
- q. Cumulative Effects – MSc, BSc; PIEMA

4.3 Scoping

Technical scope

- 4.3.1 The scope of the assessment is based on what was received within the EIA Scoping Opinion (PINS, 2024). Environmental aspects scoped in comprise water resources and flood risk; aquatic ecology; terrestrial ecology; townscape and visual; historic environment; ground conditions and contaminated land; socioeconomics, community, access and recreation; human health; carbon; climate change; traffic and transport; noise and vibration; materials and waste; and air quality. Some of these environmental aspects may only have a few matters scoped into the assessment or may only consider construction effects if significant operational effects were scoped out.
- 4.3.2 The Scoping Opinion from the Planning Inspectorate (PINS) (PINS, 2024) requested major accidents and disasters should be included as part of the ES, where it was previously proposed to be scoped out. Preliminary information relating to this aspect is set out in Appendix 4.1: Major Accidents and Disasters Technical Note and within a number of the aspect chapters.

Spatial scope

- 4.3.3 The maximum area of land to build and operate the Project will be defined by the Order limits proposed within the application for development consent. Details of the draft Order limits which will be assessed in this PEI Report are outlined in Section 2.3 of Chapter 2: Project Description.

- 4.3.4 The spatial extent of each of the technical assessments will vary in accordance with the relevant policy and guidance for the assessment of that aspect. In some instances, the environmental effects will extend no further than the draft Order limits (for example, archaeology) and in other cases (for example, townscape and visual) the assessment would extend to a buffer beyond the draft Order limits.
- 4.3.5 Appropriate study areas for each technical matter have been defined by the specialists undertaking the assessment in each of the aspect chapters and this varies between environmental aspects and matters depending on the nature of the pathways and effects. They may also vary within an aspect chapter between the construction and operational phases. For example, direct physical impacts would only occur within the construction footprint where there is temporary removal of vegetation or excavation activities. Whereas indirect impacts could be associated with emissions from vehicles or from impacts on water quality related to the discharge or abstraction points downstream. Agreement on aspect and matter specific study areas have been sought with the relevant stakeholders prior to EIA Scoping and post the receipt of the Scoping Opinion where necessary, with each technical section including a commentary on how the study area has been defined.
- 4.3.6 The spatial scope of the EIA will be considered in terms of the following:
- a. Physical extent of the Project (whether temporary or permanent) as defined by the draft Order limits proposed with the application for development consent
 - b. Nature of the existing and future baseline environment (including sensitive receptors or designations) as defined in the technical sections
 - c. Geographical extent of impacts beyond the draft Order limits
 - d. Relevant geographical boundaries of administrative organisations and authorities which would provide the relevant planning and policy context of the Project

Flexibility of design

- 4.3.7 The draft Order limits incorporate an allowance for proportionate flexibility in the design for some permanent infrastructure – primarily the recycled water conveyance tunnel. This allowance is for adjustments to the final positioning of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise.
- 4.3.8 The PINS Advice Note Nine (PINS, 2018) states it is for the applicant to choose whether there is a need to incorporate flexibility (and how much) into applications to address uncertainty. The Rochdale Envelope principle (see *R v Rochdale MBC ex parte Tew* (1999) and *R v Rochdale MBC ex parte Milne* (2000)) is an accepted way of dealing with uncertainty in preparing development applications. The ‘Rochdale Envelope’ approach is employed *‘where the nature of the Proposed Development means that some details of the Project have not been confirmed (for instance the precise location or*

dimensions of structures) when the application is submitted, and flexibility is sought to address uncertainty'. Where the details of the Project require some levels of flexibility to allow for later contractor input and refinement of designs and also to allow for any previously undefined information to be understood, this will be incorporated in alignment with the Rochdale/Design Envelope approach.

4.3.9 At this stage in the design process there is still some uncertainty and therefore flexibility is employed through design envelopes based on realistic worst-case scenarios and in some cases through optionality where more than one option is being considered.

4.3.10 The National Policy Statement for Water Resources Infrastructure, paragraph 3.2.8 (Department for Environment, Food and Rural Affairs, 2023) recognises where the design is not fixed at Development Consent Order (DCO) submission:

'...it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.'

4.3.11 Paragraph 3.2.9 highlights the steps to be taken where this is the case, outlining that:

'...where some details are still to be finalised, the Environmental Statement should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the Project, as it may be constructed, have been properly assessed.'

4.3.12 Flexibility is required for this Project as elements of the Project are yet to be finalised in terms of choice of technology, and for several elements there are options under consideration for which a preferred option is yet to be selected, for example the connection to the Thames Lee Tunnel. To the best of the Applicant's knowledge at the current time, the maximum parameters, and all likely options where options exist, are presented in Chapter 2: Project Description, to allow for the flexibility required to inform the scope of the EIA at this stage. Flexibility within maximum parameters is likely to be retained throughout the EIA and presented in the DCO submission. On this basis, the impacts of the Project as it may be constructed can be identified and effects properly assessed.

Temporal scope

4.3.13 The temporal scope of the EIA has been considered in the PEI Report and will be considered in the ES in terms of the following principal stages of development:

- a. Existing conditions of the proposed site and the surrounding areas (the existing baseline)
- b. Future conditions without the Project (the future baseline)

- c. Proposed construction phase (c.2029 to 2032)
- d. Proposed system commissioning and performance testing phase (c.2032 to 2033)
- e. Operation (assumed in 2033, with maintenance in perpetuity)
- f. No future decommissioning (operated indefinitely)

4.3.14 Given the Project is a vital drought resilience scheme, it is assumed that it will be operated, within its operational parameters, indefinitely. Therefore, decommissioning has been scoped out of the assessment as indicated in the Scoping Opinion (Ref 2.2.7 of the Scoping Opinion (PINS, 2024)). Whilst decommissioning will be scoped out of the ES, consideration of dismantling and replacing of equipment will be considered as part of the operation and maintenance of the Project. The ES will set out the predicted requirements and timescales for dismantling and replacement of equipment during operation, including the process and methods, and any land use requirements. Where this information is not known, parameters representing a worst-case scenario will be provided. The ES will assess any likely significant effects which might arise from dismantling and replacement of equipment. Mitigation required to mitigate significant adverse effects from such activity will be described and demonstrably secured in the DCO submission.

4.3.15 The temporal scope of the assessment generally refers to the time periods over which impacts may be experienced, i.e. permanent, temporary, long term, medium term or short term compared to the Project timescales and assessment years used. This has been established for each aspect chapter, and where appropriate through discussion with the relevant statutory consultees. Terms used to quantify the duration of an impact or effect are specific to the aspect being considered and the standards and criteria used against which aspect-specific effects are assessed.

4.3.16 For the purposes of assessment, the following definitions are applied unless otherwise defined in the specific aspect chapter:

- a. Existing baseline (without the Project): The baseline is the reference level of the environmental conditions without implementation of the Project, against which the potential effects of the Project are to be assessed.
- b. Future baseline (without the Project): The future baseline represents the conditions that would exist in the future in the absence of the Project. When describing the future baseline scenario for each environmental aspect, the current baseline will be extrapolated to take account of predicted or anticipated change factors. This could include changes caused by changing climatic conditions, policy, legislation and by other planned infrastructure projects, to provide a description of the likely changes to the baseline environment over an appropriate timescale that can, if necessary, be supported by appropriate datasets and modelling.
- c. Construction phase: Effects likely to begin and end with the construction phase and which do not continue following completion of construction, e.g. dust, noise and vibration. Some construction effects are related to specific activities or phases and deemed short compared to the whole construction

phase, e.g. those due to construction compound set up. Many construction impacts are temporary and reversible.

- d. Operational phase: Effects that will potentially occur as a result of the presence, operation and/or maintenance of the Project. These may be effects which start during construction and continue during the operation.

4.3.17 Environmental effects will be classified as either permanent or temporary, as appropriate. Permanent changes are those which are irreversible (e.g. permanent land take) or will last for the foreseeable future (e.g. habitat destruction or fragmentation).

4.3.18 The duration of temporary environmental effects will be defined as short, medium or long term based on the likely durations of the construction and operational phases of the Project. These definitions will be considered within the assessment of the likely significant effects and are set out in the PEI Report and will be in the ES. For the purposes of assessment, the following definitions are applied unless otherwise defined in the specific aspect chapter:

- a. Short term: This is assumed to describe effects with a duration that extends for up to 12 months.
- b. Medium term: This is assumed to describe effects with a duration that extends longer than one year and less than five years.
- c. Long term: This is assumed to describe effects with a duration that extends longer than five years but are not permanent.

4.3.19 The temporal nature of effects may extend longer than the phase in which the effects originally occur. For example, effects as a result of vegetation clearance during construction may be experienced for a number of years after construction has been completed, until any replanted habitats have matured.

4.3.20 For the purposes of the EIA, the effects are described under the phase within which the impact arises (i.e. in the above example, vegetation loss is assessed for the construction phase).

4.4 EIA methodology

4.4.1 The impact assessment is undertaken on an environmental aspect basis and involves characterising potential impacts or effects as set out in the Scoping Report and then assessing the potential for likely significant effects. The assessment of the significance of effects for the majority of environmental aspects will be based on a three-step process, as illustrated in the following paragraphs. The first step assigns sensitivity or inherent value to a receptor or resource. Sensitivity is how easily the receptor is affected by change, and value is a measure of its inherent worth.

4.4.2 Alternatively many environmental aspects have specific relevant assessment guidance to determine the significance of effects. The specific approach and methodologies adopted for each environment aspect are set out in the aspect chapters (Chapters 5 to 18).

- 4.4.3 Table 4.1 provides broad definitions of value or sensitivity, which have been adapted from good practice assessment guidance. Each aspect chapter defines the sensitivity or value of matters specific to that aspect where scoped into the assessment.

Table 4.1 Value or sensitivity criteria

Value/sensitivity	General criteria
High	High or very high importance and rarity, international or national scale and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution.
Low	Low or medium importance and rarity, local scale.
Negligible	Very low importance and rarity, local scale.

- 4.4.4 The second step of the assessment will determine the likely magnitude of the potential impact. This is the scale of the change caused to the baseline conditions, considering both the degree of change from the baseline conditions and the duration and/or reversibility of the effect. The assessment of magnitude takes into consideration all primary and tertiary mitigation measures and good practice measures as described in the aspect chapters (Chapters 5 to 18).
- 4.4.5 Table 4.2 provides broad definitions of magnitude, which have been adapted from good practice assessment guidance. Each aspect chapter defines the magnitude criteria of matters specific to that aspect where scoped into the assessment.

Table 4.2 Magnitude criteria

Magnitude	General criteria
Large	Adverse: Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements. Beneficial: Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Medium	Adverse: Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements. Beneficial: Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Small	Adverse: Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements. Beneficial: Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible/no change	Adverse: Very minor or no loss/detrimental alteration to one or more characteristics, features or elements.

Magnitude	General criteria
	Beneficial: Very minor or no benefit or positive addition to one or more characteristics, features or elements.

- 4.4.6 The third step in the process is where consideration is given to the likely significance of effect. This will be considered as a function of the sensitivity or value of the receptor and the magnitude of the potential impact on it.
- 4.4.7 The approach to assessing and assigning significance to an environmental effect has regard to factors such as legislative requirements, guidelines, standards and codes of practice, consideration of the EIA Regulations, the advice and views of statutory consultees and other interested parties, and expert judgement. Table 4.3 outlines the table of significance which will be used by many environmental aspects for this PEI Report.

Table 4.3 Table of significance

	Magnitude of change				
Receptor value/ sensitivity	No change	Negligible	Small	Medium	Large
Negligible	No change (Not significant)	Neutral (Not significant)	Neutral or Minor (Not significant)	Neutral or Minor (Not significant)	Minor (Not significant)
Low	No change (Not significant)	Neutral or Minor (Not significant)	Neutral or Minor (Not significant)	Minor (Not significant)	Minor (Not significant) or Moderate (Significant)
Medium	No change (Not significant)	Neutral or Minor (Not significant)	Minor (Not significant)	Moderate (Significant)	Moderate or Major (Significant)
High	No change (Not significant)	Minor (Not significant)	Minor (Not significant) or Moderate (Significant)	Moderate or Major (Significant)	Major (Significant)

- 4.4.8 The influence of impact duration on the overall significance of effect will also be considered as part of the determination of magnitude and sensitivity to change.
- 4.4.9 A high sensitivity receptor subject to a large magnitude of change would experience a major significance effect, and a negligible sensitivity receptor subject to a medium magnitude of change would experience a neutral or minor significance effect.

- 4.4.10 Effects will be concluded as either significant or not significant unless otherwise stated in the individual chapters. Allocating significance requires the application of professional judgement. In general, however, where effects are scored minor, neutral or no change, these effects are not significant in the context of the EIA Regulations and as such are not reported in detail in this PEI Report or in the ES. The exception to this is where the combination of multiple minor effects has the potential to lead to a significant (i.e. moderate or above) cumulative effect.
- 4.4.11 After initial consideration of the effects of the Project and their potential significance, consideration is given to how those significant effects could be avoided, prevented or reduced. This is referred to as mitigation. Each aspect section, where relevant, will identify proposed mitigation measures that may be required to avoid or reduce the potential significant adverse effects of the Project.
- 4.4.12 The EIA and the Project design incorporate mitigation measures following a hierarchical system as follows:
- a. Avoidance and prevention: Design and mitigation measures to prevent the effect (e.g. alternative design options or avoidance of environmentally sensitive sites).
 - b. Reduction: Where avoidance is not possible, then mitigation is used to lessen the magnitude of impact or significance of effects.
- 4.4.13 For the purposes of the EIA, mitigation has been defined using guidance taken from the Institute of Environmental Management and Assessment (IEMA) with mitigation falling into three categories:
- a. Embedded design (primary) mitigation – Modifications to the location or design of the Project which are a result of design evolution. Modifications which are an inherent part of the Project design for the purpose of avoiding, preventing or reducing likely significant environmental effects. For example, reducing the height of a development to reduce visual impacts or inclusion of areas of habitat planting in the design to mitigate ecological impacts.
 - b. Additional (secondary) mitigation – Measures or actions to prevent or reduce any remaining significant adverse effects of the Project identified through the EIA process. For example, additional noise screening for properties above that provided as part of the Project design, translocating species to a receptor site, provision of ecological mitigation, e.g. bat boxes.
 - c. Standard good practice (tertiary) mitigation – Standard good practice measures or actions to reduce impacts, regardless of the design process and EIA assessment. These include actions that will be undertaken to meet existing legislative requirements, and/or actions that are considered to be standard good practice used to manage commonly occurring environmental effects during the construction and operational phases. For example, root protection zones when working near trees and considerate contractors' practices that manage activities which have potential nuisance and environmental effects, such as the spillage of fuels, oils or other chemicals.

- 4.4.14 Where it is not possible to avoid, prevent or reduce an adverse effect then the Project would consider the following:
- a. Enhancement: Measures taken to achieve a net benefit, which are unrelated to an adverse impact, or which go beyond that required to mitigate for an impact. For example, restoration of a degraded habitat to leave it in a measurably better state than it was before the Project, or other interventions to leave a positive legacy for the environment and community.
 - b. Compensation: Measures taken to make up for the negative environmental impacts, loss of or permanent damage to, resources through the provision of replacement areas, similar to those lost.
 - c. Offsetting: Measures used to make up for unavoidable negative impacts on the environment. These offsets aim to achieve a 'no net loss' or even a 'net environmental gain' by implementing positive actions to ensure positive outcomes to the environment. This may be located outside of the Project site. Offsets can include activities like habitat restoration, creation of new habitats, or other conservation actions.
- 4.4.15 A Commitments Register is provided in Volume 3 PEI Report Appendices as Appendix 4.2.

Code of Construction Practice

- 4.4.16 A draft Code of Construction Practice (CoCP) has been prepared, setting out a framework for the management of environmental mitigation measures and controls during construction. This is provided in Volume 3 PEI Report Appendices as Appendix 4.3.
- 4.4.17 The draft CoCP focuses on setting the good practice (tertiary) mitigation measures that would be put in place to help manage the effects of construction. Additional (secondary) mitigation measures for significant effects will be added as the Project design develops and environmental assessments progress.
- 4.4.18 It is currently intended that the updated CoCP submitted with the DCO application will comprise two parts:
- a. Part A: General controls. These measures are applicable Project-wide, across all construction sites and compounds.
 - b. Part B: Site-specific controls. These measures refine and supplement the controls set out in Part A with site-specific measures, recognising these will vary based on the location and types of activities being carried out.
- 4.4.19 Table 4.4 sets out the stages through which the CoCP and Construction Environmental Management Plan (CEMP) will be developed through the stages of the Project. An updated version of the CoCP will be submitted with the DCO application taking account of feedback from consultation and stakeholder engagement and the environmental assessment work being undertaken to inform the ES. The CoCP will be kept under review throughout the public examination of the application for development consent, taking into account submissions made during that process, and the final version of the CoCP at the end of the examination will become certified when the DCO is made.

Table 4.4 Development stages of the CoCP and CEMP

Project stage	Version of the CoCP/CEMP
Design stage Statutory Consultation	Draft CoCP. This version. Produced in support of the PEI Report and Statutory Consultation.
Design stage DCO submission	CoCP. Application version. Developed in support of the ES. Submitted as part of the application for development consent.
Design stage DCO examination	CoCP. Final version. Developed legally certified under the DCO.
Construction	CEMP. Developed by the contractor to set out how the commitments in the CoCP and legally required under the DCO will be implemented.

- 4.4.20 The final CoCP will outline the measures that will be developed in the CEMP to be implemented by the contractor to mitigate potential effects on the local community and environment during construction. The measures set out in the CoCP will be legally binding under the DCO. The contractors responsible for the delivery of construction will be required to develop a CEMP substantially in accordance with the CoCP to control environmental impacts during the relevant works for acceptance prior to the commencement of works.

Direct and indirect effects

- 4.4.21 The recent Supreme Court judgment on the Finch case (Finch v Surrey County Council [2024] UKSC 20) has been considered in the preparation of this PEI Report and the proposed scope and methodology for each aspect, with particular attention to potential upstream and downstream direct and indirect effects where practicable and appropriate. In this context, the terms ‘upstream’ and ‘downstream’ refer respectively to effects arising from activities that are required to facilitate the development of the Project and activities that are consequential to the Project (i.e. inputs to and outputs from the Project). In this PEI Report, certain environmental aspects, such as water resources and flood risk and aquatic ecology consider downstream impacts from a water flow perspective, for example, impacts from releases of water from the Project, with downstream meaning down from the outfall point along the River Thames. In this PEI Report we refer to upstream and downstream effects in the general sense of effects associated with the inputs and outputs of the Project.

4.5 Consultation and engagement

Overview of environmental engagement for the Project

- 4.5.1 To date, Project engagement and consultation on water resource planning has been undertaken as part of the Water Resources South East draft Regional Plan (WRSE, 2023) and the draft Water Resources Management Plan (dWRMP24) (Thames Water, 2024b), and through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated report submission to Ofwat, the Environment Agency and the Drinking Water Inspectorate.
- 4.5.2 Engagement with the National Appraisal Unit (NAU), the Environment Agency and Natural England at RAPID Gate 1 (2020) was undertaken primarily to inform the requirements for the water resources and aquatic ecology assessments in the early stages of understanding key risks. Technical Working Groups (TWGs) were set up with the NAU, Environment Agency, Natural England, Historic England and the Port of London Authority where scopes of work were developed, methodological approaches agreed and outputs on critical topics shared. Over 50 technical workshops have been held since 2021 covering the following areas of interest:
- a. Engineering design
 - b. Terrestrial ecology and Biodiversity Net Gain
 - c. Fisheries
 - d. Water quality
 - e. Aquatic modelling
 - f. Aquatic ecology
 - g. Regulatory assessments
 - h. Navigation
 - i. Historic environment
- 4.5.3 Engagement with these organisations and use of TWGs has continued as the Project progresses. The design presented at statutory consultation is assessed in this PEI Report.

Draft Water Resource Management Plan 2024 consultation

- 4.5.4 The dWRMP24 (Thames Water, 2024b) 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 dWRMP24.
- 4.5.5 Five public events were held close to the proposed locations for the new water resource schemes included in the Applicant's dWRMP24. For the Project these locations were in Richmond and Twickenham, which were attended by 633

people. A webinar was also held focusing on the Project, which was attended by 213 people.

- 4.5.6 The consultation received 1,687 responses from a wide range of local, regional and national stakeholders. An independent consultancy worked with the Applicant to log, code and analyse the comments received to the consultation.

Autumn 2023 non-statutory public consultation

- 4.5.7 The Applicant undertook a non-statutory public consultation from 17 October 2023 to 11 December 2023 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 for the pipejacking design. The Applicant sought to collect feedback from a variety of people such as landowners, residents, businesses, local authorities and other statutory bodies who might be affected by or interested in the Project to help develop the Project.
- 4.5.8 During the consultation, four public events were held. The locations, dates, and attendance are detailed in Table 4.5.

Table 4.5 Overview of autumn 2023 non-statutory consultation events

Date	Location	Attendance*
3 November 2023, 2–8pm	York House	205
9 November 2023, 2–8pm	Peter and Paul Centre	125
13 November 2023, 2–8pm	Twickenham Stadium	83
20 November 2023, 2–8pm	YMCA Hawker	330

**Note that these are an approximate number of attendees*

- 4.5.9 Local Members of Parliament and senior leaders from local authorities were invited to attend. Here they were given an opportunity to familiarise themselves with the consultation materials as well as the chance to speak with members of Thames Water.
- 4.5.10 The consultation received 2,312 responses from stakeholders and members of the public. An independent consultancy logged, coded and analysed the feedback, before passing to the Project team to review and consider responses.

Autumn 2024 public information events

- 4.5.11 The Applicant undertook public information events from 1 October 2024 to 14 October 2024 to provide details on the changes to the Project design with the local community, explain how these changes have developed and speak to potentially affected landowners. These events did not offer a formal opportunity to provide feedback.
- 4.5.12 These October events followed the Statement of Response published on 17 September 2024 (Thames Water, 2023). The feedback received during the

2023 consultation informed the ongoing design, which was displayed at the October public information events. Table 4.6 outlines details on the date, location and attendance at each of these events.

Table 4.6 Overview of autumn 2024 public information events

Date	Location	Attendance*
1 October 2024, 2–7pm	Isleworth Public Hall	104
5 October 2024, 10–4pm	St Richard’s Church	260
9 October 2024, 2–8pm	Doubletree by Hilton	140
14 October 2024, 2–8pm	York House	226

**Note that these are an approximate number of attendees*

Local planning authorities engagement

- 4.5.13 In January 2024, engagement was held with the local planning authorities (LPAs) (London Borough of Hounslow, London Borough of Richmond upon Thames and Royal Borough of Kingston upon Thames) to provide updates on the Project, its status and identify a joint approach to engagement during the pre-application period.
- 4.5.14 In summer 2024, the relevant LPAs for the Project – London Borough of Hounslow, London Borough of Richmond upon Thames and Royal Borough of Kingston upon Thames – were briefed during a series of engagement meetings related to the Scoping Report. These meetings outlined the Project, its significance within the WRMP and the ongoing work to explore its potential delivery. Issues discussed during those briefings included construction impacts, permanent design of above ground infrastructure, construction within open space and Metropolitan Open Land, works at Mogden Sewage Treatment Works, community engagement and the role of the local labour market.
- 4.5.15 As work on the Project has progressed a series of pre-application meetings have been held jointly between the Applicant and the three LPAs, covering:
- Project introductions and updates
 - Approaches to ecological assessment
 - Design updates
 - Establishing and providing feedback on technical subject-specific meetings
 - A series of nine technical subject-specific meetings to inform issues of importance to the EIA Scoping process
 - A series of eight technical aspect-specific meetings were undertaken in March 2025 following the receipt of the Scoping Opinion and to inform the PEI Report and ES.

4.6 Other environmental assessments

- 4.6.1 EIA is a process, within UK law, which requires the preparation and consolidation of information relating to the likely significant effects of a development. Additional relevant environmental legislation applies to the Project, which requires additional assessments, which would support the EIA process. As part of the Project, the following assessments have been undertaken, and the results presented in the appendices of this PEI Report:
- a. Appendix 5.2: Flood Risk Assessment (FRA)
 - b. Appendix 5.3: Water Framework Directive (WFD) Screening
 - c. Appendix 7.1: Habitats Regulations Assessment (HRA) – Stage 1 Screening
 - d. Appendix 16.4: Approach to Equalities Impact Assessment (EqIA)
- 4.6.2 Whilst these are separate assessments, they are integral to the EIA process due to their direct relationship to a number of the aspects they are associated with.

4.7 References

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