Teddington Direct River Abstraction

Pre-Application Programme Document

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1 Introduction

1.1 The purpose of this document

1.1.1 In 2020, the National Infrastructure Strategy established a government ambition to accelerate and improve the decision-making process for major infrastructure projects, including those considered under the Planning Act 2008 (PA2008). Following an operational review of the PA2008 process beginning in 2021, the Department for Levelling Up, Housing and Communities (DLUHC) (now the Ministry for Housing, Communities and Local Government (MHCLG)) published an Action Plan setting out proposed reforms that would be implemented to ensure the PA2008 process can support the country's future infrastructure needs. Between July and September 2023, DLUHC consulted on the details of the operational reforms and government's response to the consultation was published on 6 March 2024.

1.1.2 The Planning Inspectorate (PINS) responded to the government brief by developing new pre-application services which are set out in their 2024 Pre-application Prospectus (Planning Inspectorate, 2024a). This included the introduction of three pre-application tier options reflecting different levels of service that applicants may receive from PINS ahead of submitting an application and the introduction of fees associated with each service tier.

1.1.3 PINS subsequently updated its 2024 Pre-application Prospectus on 22 October 2025 to incorporate various updates to the primary service features, a new Programme Document template, expectations of applicants when preparing to interact with PINS, and style updates. It is noted that the updated Programme Document template must only be used for projects entering the system from 1 November 2025, and as such this document follows the previous template.

1.1.4 Thames Water ('the Applicant') notes that across all three tiers of pre-application service, all applicants are expected to engage in five primary service features, which the Inspectorate considers to be fundamental general requirements for improved service, certainty and outcomes.

1.1.5 This Document has been produced to support service feature 1. Programme Document, which requires 'the production and maintenance, by the applicant, of a pre-application Programme Document setting out the main steps that the applicant anticipates taking during the preparation of the application' (Planning Inspectorate, 2024a).

1.1.6 The Programme Document is not a statutory requirement and is not for consultation. However, The Applicant recognises the importance of enabling meaningful inputs from consultees through pre-application engagement, and how programme documents can help. The latest version of the pre-application Programme Document will be published on the Teddington Direct River Abstraction project (the Project) website (Thames Water Utilities Limited, 2026)) to support our on-going pre-application engagement.

1.1.7 As recognised by PINS this is a fifth iteration of the document. The Applicant would welcome the opportunity to talk through this draft document to refine as necessary for the purposes of supporting pre-application service provision.

1.1.8 Please note that this document is based on information current at the date of sharing with the Inspectorate and could be subject to change. For future published versions, please check the Project website for the most up to date version of this document.

1.2 Structure of this document

1.2.1 This Document contains the following sections:

a. Introduction

b. The Planning Inspectorate's Pre-application Service and the Pre-application Programme

c. Engagement with Statutory Consultees, Local Authorities and Affected Persons

d. Main Issues raised through engagement

e. Review of Progress through the Pre-application Stage

f. Conclusion

1.3 Background to the Project

1.3.1 Every water company must prepare and maintain a Water Resources Management Plan (WRMP). This plan is updated every five years and sets out how Thames Water will achieve a secure supply of water for our customers whilst protecting the environment. WRMPs are long-term plans that require forecasting of future scenarios using a range of data.

1.3.2 The Teddington Direct River Abstraction (TDRA) project is part of Thames Water's wider package of actions and investment identified in its WRMP 2024 (WRMP24) to provide enough water to increase our drought resilience in London to a 1 in 200-year level by the early 2030s.

1.3.3 The strategic case for the Project is outlined in the WRMP24, which was confirmed and approved by the government in Autumn 2024. The WRMP24 sets out a range of investment measures proposed to combat the effects of climate change and population growth in London and the wider south-east region.

1.3.4 Through Water Resources South East (WRSE), Thames Water is also working with the other five water companies that supply the south-east region's drinking water to develop a joint revised draft regional plan that addresses the climate and environmental emergency threatening our water resources. This

collaborative approach means we can look beyond our individual boundaries and work together to secure the region's future water supplies.

1.4 The Project

1.4.1 The Project is intended to provide up to 75 million litres per day of water during periods of drought. The Project would abstract water from the River Thames upstream of Teddington Weir and transfer the water along a section of new connecting pipeline to an existing underground tunnel to our reservoirs in the Lee Valley to become drinking water. The abstracted water would be replaced with recycled water from Mogden Sewage Treatment Works (STW) in Isleworth, transferred to the River Thames along a new underground tunnel to an outfall structure upstream of Teddington Weir and downstream of the abstraction.

1.4.2 The proposed Project infrastructure includes:

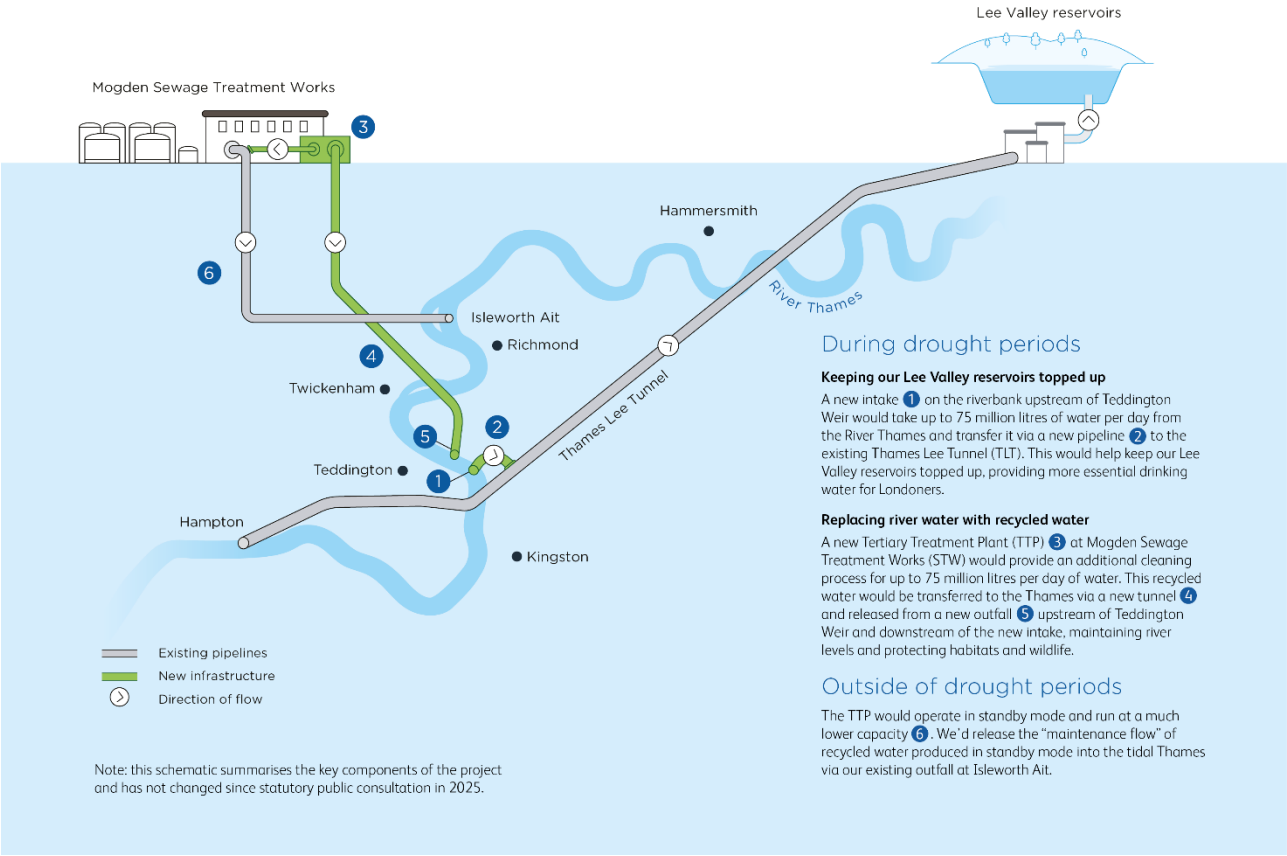
a. Tertiary Treatment Plant (TTP) at Mogden STW to treat part of the final effluent produced at Mogden STW to create recycled water

b. A new tunnel to convey the recycled water from Mogden to the River Thames and a new discharge outfall

c. A new river water abstraction facility to be situated in close proximity and upstream of the discharge outfall. The abstraction would provide a screened intake for flows

d. A new pipeline that would connect the abstraction facility to the existing Thames Lee Tunnel (TLT) raw water main

Figure 1 The Teddington Direct River Abstraction Project



1.4.3 The TLT is an existing below ground raw water asset operated by Thames Water to convey raw water supply between its water abstraction and storage assets in west London to its water storage and treatment assets in the Lee Valley in north / north-east London. The TLT is existing water infrastructure serving the Greater London area, as represented above in Figure 1.

1.4.4 As a drought resilience project, TDRA is only planned to be used during and in advance of drought conditions.

1.4.5 The preliminary design for the Project is currently being developed including through engagement with and feedback from stakeholders. Updates on the latest proposals and design will be published on the Project website (Thames Water Utilities Limited, 2026).

Qualification as a Project of national significance

1.4.6 The Project does not automatically qualify under the PA2008 as a Nationally Significant Infrastructure Project (NSIP), as water recycling is not a specified infrastructure category under section 14 of the PA2008.

1.4.7 On 2 November 2023, the Applicant submitted a 'qualifying request' in accordance with Section 35Z(A) of the PA2008 to request that the Secretary of State exercise the power under Section 35(1) of the PA2008 to direct that the

principal elements of the Project be treated as development of national significance for which development consent is required.

1.4.8 The 'qualifying request' submitted to the Secretary of State outlined the reasons why it was considered that the most appropriate route for planning consent for the Project is via the PA2008 through a Development Consent Order (DCO). A copy of the Applicant's 'qualifying request' has been provided to the Planning Inspectorate and is also available online (Department for Environment, Food and Rural Affairs (Defra), 2023).

1.4.9 The Secretary of State requested further information from the Applicant on 17 November 2023, and this information was supplied by the Applicant to the Secretary of State on 28 November 2023.

1.4.10 The Secretary of State issued their decision on 5 March 2024, directing that the Project is nationally significant, and therefore should be treated as development for which development consent is required. The Secretary of State Direction under section 35 of the PA2008 is available on the Planning Inspectorate's Project pages, under Documents (Secretary of State, 2024).

Licenses and non-planning consents

1.4.11 The Project will require other licenses and non-planning consents which may not be included in the draft DCO. The Applicant will prepare and submit an Other Consents and Licenses Position Statement with the DCO application which will set out what consents and agreements are not contained within the draft DCO, and summarise the current position at the point of DCO application submission.

Policy context

1.4.12 Section 104 of the PA2008 requires that, where a relevant National Policy Statement has effect, DCO applications should be determined in accordance with that National Policy Statement (subject to certain statutory exceptions). In this case, that is the National Policy Statement for Water Resources Infrastructure dated July 2025 (Defra, 2025). The SoS must also have regard to, amongst other things, any local impact report prepared by local authorities whose areas are affected, and any other matters which the SoS thinks are both important and relevant to the decision.

1.4.13 Therefore, whilst the relevant National Policy Statement is the primary policy in accordance with which the DCO application will be determined, other national and local planning policy, where relevant, may be an 'important and relevant' matter in the determination of the application.

1.4.14 The relevant national, regional and local planning policy context for the Project will be set out in the Planning Statement to be prepared and submitted with the DCO application, including the following:

a. National Policy Statement for Water Resources Infrastructure (Defra, July 2025)
b. National Planning Policy Framework (MHCLG, August 2026)
c. Planning Practice Guidance
d. Water Resources South East Regional Plan (Water Resources South East, 2025)
e. London Plan (Greater London Authority, 2021)
f. London Borough of Hounslow Development Plan
g. Royal Borough of Kingston upon Thames Development Plan
h. London Borough of Richmond upon Thames Development Plan

2 The Planning Inspectorate's pre-application service and the pre-application programme

2.1 Pre-application service

2.1.1 It has been confirmed that this Project will follow the 'Standard' pre-application service tier as set out in the PINS Pre-application Service Prospectus (PINS, 2024a).

2.2 Current pre-application programme (as of August 2026)

2.2.1 The Project programme is driven by a number of factors, most critical of which is the need to be operational to enable London to be resilient to drought risk. The programme below focuses on the activities that enable consultees to engage with the development of the Project as well as covering the pre-application requirements.

2.2.2 The current pre-application Project programme is shown in Appendix A.

2.2.3 The programme shown in Appendix A will be updated as necessary during the pre-application period to publicise completion of significant stages and demonstrate progress in preparation of our application for development consent. Please note that the programme is subject to change and will be reviewed on a regular basis. Updates to key milestones in the pre-application programme will be communicated to key stakeholders and published on the Project website (Thames Water Utilities Limited, 2026).

2.3 Completed pre-application activities (as of August 2026)

Non-statutory public consultation

2.3.1 A non-statutory public consultation was held on site options for the Project in October-December 2023, during which over 2,000 responses were received. The feedback from this consultation has been considered and has informed design development further. Copies of the non-statutory consultation documents are available on the Project website (Thames Water Utilities Limited, 2026).

Public information events

2.3.2 During October 2024, following publication in September 2024 of the Project Statement of Response to the non-statutory consultation, a series of community information events were held to provide local communities with an opportunity to learn about changes that were being made to the Project following the non-statutory consultation process. The four events were attended by over 700 visitors.

Environmental Impact Assessment scoping

2.3.3 The Project EIA Scoping Report (Thames Water, 2024) was submitted to PINS in October 2024, building on the work completed since the non-statutory Consultation period and ongoing technical engagement with Statutory Consultees. The latter included engagement throughout 2024 with the Environment Agency and with the three host Local Planning Authorities (LPAs) for the Project, including subject matter engagement to help inform development of the proposed EIA Scope and method. The EIA Scoping process was completed by the receipt of the PINS EIA Scoping Opinion in November 2024 (PINS, 2024b).

Statutory Consultation

2.3.4 Work since November 2024 focussed on the further refinement of the Project design and on the preparation of materials required for the Project's Statutory Consultation period, including the production of the Project's Preliminary Environmental Information Report.

2.3.5 Alongside these activities, the Project's Statement of Community Consultation (SoCC) was prepared, including initial briefings with the three host LPAs in winter 2024 and circulation of an informal draft to each LPA for comment in December 2024 / January 2025. Formal consultation on the SoCC with the three host LPAs and also the Greater London Authority (GLA) was undertaken in March 2025, and the final version was published as part of the Project's Statutory Consultation.

2.3.6 The Project's Statutory Consultation took place between 17 June and 26 August 2025, during which almost 15,000 responses were received. During the consultation period there were eight in-person public information events which took place across the geographical extent of the Project, as well as two online information events. Copies of the Statutory Consultation documents are available on the Project website (Thames Water Utilities Limited, 2026).

2.3.7 Work since the Statutory Consultation closed on 26 August 2025 has focused on the consideration of consultation feedback as well as beginning the preparation of DCO submission documents.

Supplementary Consultation

2.3.8 After reviewing Statutory Consultation feedback, alongside continuing discussions with key stakeholders and analysing further information from technical assessments and surveys, the Applicant has been able to make several design changes to the Project including the removal of the intermediate shaft at Ham Playing Fields from the design.

2.3.9 The Applicant also identified specific areas – land near Burnell Avenue and Beaufort Road – where further changes to the Project design may be needed. The Project therefore held a Supplementary Consultation which took place

between 21 May and 18 June 2026, during which approximately 900 responses were received. During the consultation period an in-person public information event was held, as well as an online information event with an opportunity to ask questions of the Project team. Copies of the Supplementary Consultation documents are available on the Project website (Thames Water Utilities Limited, 2026).

2.3.10 Since the Supplementary Consultation closed, work has begun on considering all the responses to feed into the ongoing preparation of DCO submission documents.

2.3.11 Consideration of the need for any further consultation is ongoing as design development and engagement continues.

Engagement with the Planning Inspectorate

2.3.12 The TDRA Inception Meeting with the Planning Inspectorate was held on 23 October 2023, with further Project update meetings held on 13 December 2023 and 16 August 2024. Minutes of these meetings are available on the Planning Inspectorate's Project pages, under Section 51 advice (PINS, 2026).

2.3.13 A pre-section 42 consultation meeting with PINS was held on 16 June 2025. Details of the Section 51 advice provided during this meeting is available on PINS's Project pages, under Section 51 advice (PINS, 2026).

2.3.14 On 16 June 2025, the Applicant submitted a notification under section 46 of the PA2008 to notify PINS of the intention to submit an application for an order granting development consent for the Project, and supplied the information for consultation under section 42 of the PA2008. PINS acknowledged this notification on 16 June 2025.

2.3.15 On 28 October 2025, PINS advised the Applicant that the Pre-application Prospectus had been updated, with a summary of the changes and clarifications that had been applied.

2.3.16 A post-section 42 consultation project update meeting with PINS was held on 19 November 2025. Details of the Section 51 advice provided during this meeting, as well as additional advice to the applicant following the advice log on 10 February 2026, are available on PINS Project pages, under Section 51 advice (PINS, 2026).

2.3.17 The latest project update meeting with PINS was held on 24 March 2026, with further section 51 advice provided following the meeting.

2.3.18 On 20 May 2026, the Applicant submitted a notification under section 46 of the PA2008 to notify PINS of the intention to submit an application for an order granting development consent for the Project, and supplied the information for consultation under section 42 of the PA2008 for the Supplementary Consultation on land near Burnell Avenue and Beaufort Road.

2.4 Ongoing and upcoming pre-application activities (August 2026 – January 2027)

2.4.1 The following key pre-application activities are anticipated to commence / continue between August 2026 and January 2027:

a. Pre-application engagement with key stakeholders (commenced 2021 – ongoing)

b. EIA baseline surveys (commenced 2021 – ongoing)

c. Publication of Statement of Community Consultation (June 2025)

d. Statutory Consultation (June – August 2025)

e. Supplementary Consultation (May – June 2026)

f. Consideration of consultation feedback (August 2025 – ongoing)

g. Preparation of DCO Submission documents (October 2025 – ongoing)

h. PINS review of draft documents (September – November 2026 (to be agreed))

2.5 Upcoming pre-application engagement with PINS

2.5.1 As per the 'Standard' pre-application service tier, a maximum of six project meeting per annum could be arranged with PINS. The schedule of future meetings at key milestones of the Project will be agreed with PINS. An indicative meeting schedule is provided in the Table below.

Table 1 Upcoming pre-application engagement with PINS

Indicative meeting	Proposed Timing
Project update meeting	August 2026
Draft documents feedback meeting	Q4 2026 (to be agreed)
Pre-submission meeting	Q1 2027

2.5.2 Please note that the programme is subject to change and will be reviewed on a regular basis. In light of the new guidance for the Planning and Infrastructure Act 2025 issued by government, the Adequacy of Consultation Milestone has been removed from the pre-application programme. Consideration is also being given to the requirement for further supplementary consultation and/or engagement as a result of recent updates to the Project and in light of the new guidance for the Planning and Infrastructure Act 2025.

2.5.3 Updates to key milestones in the pre-application programme will be communicated to key stakeholders and published on the Project website (Thames Water Utilities Limited, 2026).

3 Engagement with Statutory Consultees, Local Authorities and Affected Persons

3.1.1 The Project is currently in the pre-application stage. Our engagement to date has been proportionate and effective for the stage the Project is at and has comprised a mix of regular meetings in line with service level agreements, technical engagement on specialist issues and correspondence to handle queries from statutory consultees and local authorities.

3.1.2 We have, and where appropriate we will further support statutory consultees' activities through suitable service level agreements, including provisions established through changes to the PA2008 (cost recovery) and through the use of Planning Performance Agreements (where appropriate).

3.1.3 To date, engagement with statutory consultees and local authorities has comprised the following:

a. Regular programmed meetings with the Environment Agency and Natural England

b. Regular programmed meetings with the host LPAs

c. Briefings to elected officials at appropriate milestones of the Project

d. Additional introductory and issue specific (technical liaison) meetings with relevant statutory consultees including the Port of London Authority and GLA

e. Ongoing engagement with the regulators through the RAPID process on the development of the Project

3.1.4 In addition to the above, three public consultations on the Project have now been delivered (non-statutory consultation in October-December 2023, Statutory Consultation in June-August 2025, and another non-statutory consultation in May-June 2026), enabling all consultees and interested parties to comment on the emerging proposals for the Project. The approach to the Statutory Consultation is set out in the SoCC which can be found on the Project consultation website (Thames Water, 2025).

3.1.5 The Project potentially affects persons with an interest in land under section 44 of the PA2008 due to surface and below ground construction works. We have an on-going programme of engagement for all relevant affected persons.

4 Main Issues raised through engagement

4.1.1 This Section provides an overview of main issues raised through public consultation to date. A Potential Main Issues for Examination (PMIE) Document will be prepared by the Applicant as part of the DCO application submission.

4.2 Non-statutory public consultation (2023)

4.2.1 Our non-statutory public consultation took place between 17 October and 11 December 2023, focussing on site options and Project engagement activities set out in section 2.3 above. As part of this our stakeholders informed us of their main issues which, in summary, include:

a. The relationship between recycled water discharge, river water quality and river usage

b. Impacts upon water ecology including through river water abstraction

c. Construction of a new tunnel and its associated impacts at intermediate shaft sites. Changes have been incorporated into the project (July 2024) following feedback from stakeholders, including changing the design of the recycled water pipeline, changing the construction method for the recycled water pipeline, and reducing the number of intermediate shafts and construction areas initially proposed

d. Permanent above ground development in the public realm

e. Construction impacts associated with each development site, including but not limited to:

   i. Duration

   ii. Traffic and transport

   iii. Noise and air quality

   iv. Visual and amenity

   v. The availability of alternative approaches

4.3 Statutory public consultation (2025)

4.3.1 Our Statutory Consultation took place between 17 June and 26 August 2025, presenting updated Project proposals based on feedback provided during non-statutory consultation and from ongoing stakeholder engagement. The proposals included Project operation and maintenance, indicative construction activities and schedule, potential effects and how to manage these, how land needed for the Project would be used, our draft overarching Design Principles, and outline plans for legacy and benefits.

4.3.2 Respondents raised a variety of issues and topics in their feedback, some of which were also raised during the 2023 non-statutory consultation. Examples of recurrent themes in feedback are listed below:

a. The relationship between recycled water discharge, river water quality and river usage, particularly regarding impacts on recreation and health

b. Impacts upon aquatic ecology, including through river water abstraction and recycled water discharge, and the requirement for mitigation

c. Permanent above-ground development in the public realm, and potential impacts on access, recreation and townscape

d. Construction of the recycled water conveyance tunnel and concerns about potential impacts on properties in the tunnel corridor

e. Environmental and community impacts during the construction phase, including:

   i. Disruption and duration of works

   ii. Congestion and road safety risks due to construction traffic

   iii. Air quality, including dust and emissions

   iv. Noise and vibration

   v. Impacts on access to green space and recreation

f. Comments on the draft overarching Design Principles, including queries as to how these would be implemented and suggestions for what they should cover

g. Comments about proposed benefits and legacy enhancements, including suggestions for specific initiatives

4.3.3 The Applicant is maintaining a live issues tracking process to record and track progress regarding issues raised and identified by relevant stakeholders. The information will be made available to PINS as well as any affected statutory bodies and local authorities, in accordance with guidance on the primary service feature 2 within the PINS Pre-application Prospectus (PINS, 2024a).

4.3.4 This section of the Programme Document will evolve with the issues tracking process to identify live issues for resolution with local authorities and other statutory bodies, as well as pre-application risks.

4.3.5 Further consultation and engagement activities are planned to take place during the pre-application process, including:

a. Technical stakeholder engagement: throughout pre-application

b. Local interest and community group engagement: throughout pre-application

c. Landowners: throughout pre-application

4.3.6 Section 3 provides additional detail on engagement activities with Statutory Consultees. The Applicant notes that pre-application is only one stage in the DCO process and engagement will be an on-going process through examination and, if consented, through construction and operation.

4.4 Non-statutory supplementary public consultation (2026)

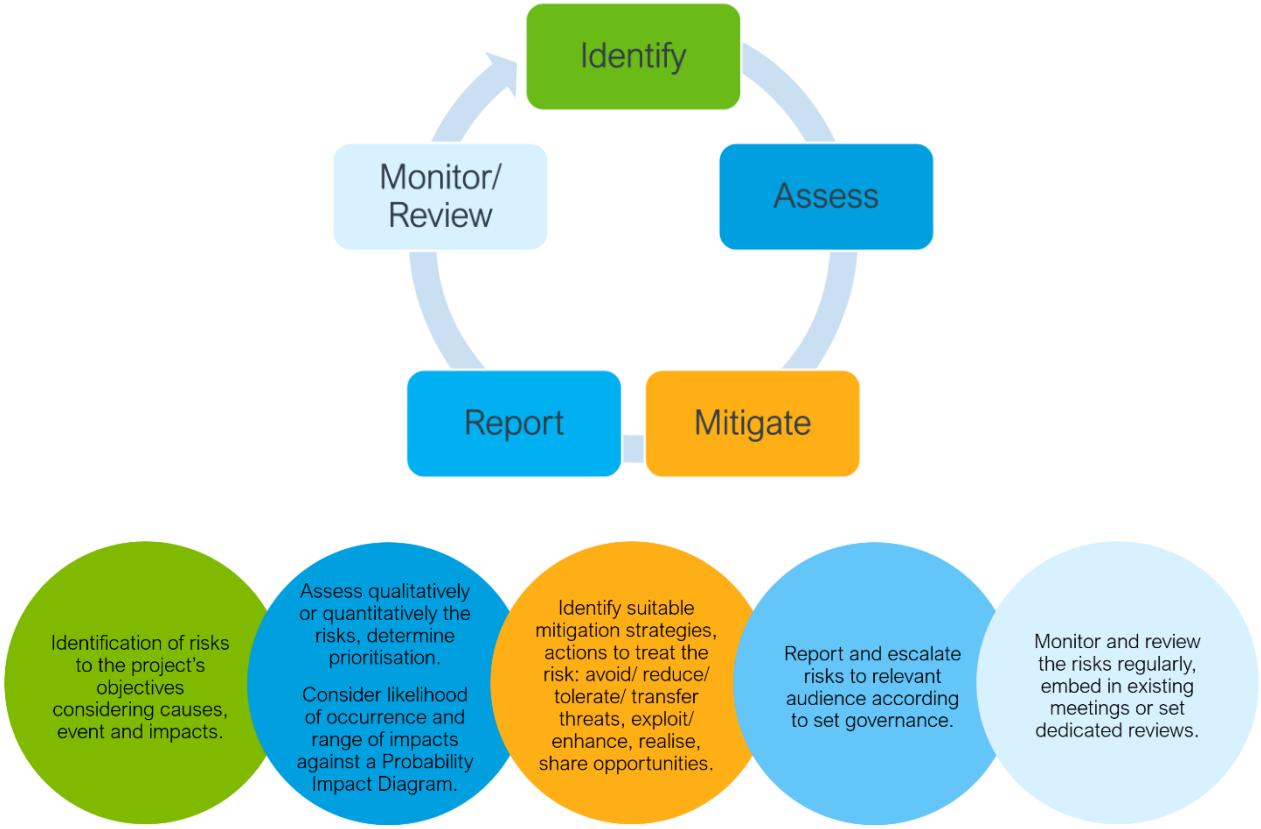
4.4.1 Our non-statutory supplementary public consultation took place between 21 May and 18 June 2026, focussing on localised design updates at Burnell Avenue and Beaufort Road as set out in section 3.3 above. The Applicant is in the process of considering all the feedback received, and subsequently this section of the Programme Document will be updated in accordance with the issues tracking process.

5 Review of progress through the pre-application stage

5.1.1 Progress through the pre-application stage will be reviewed on a regular basis and, where any risks are identified to achieving the milestones identified within our programme, these will be actively managed as far as possible to mitigate revisions to the programme for submission of our application for development consent.

5.1.2 Where potential risks to the achievement of the pre-application stage are identified, they will be managed in accordance with the approach outlined in Figure 2 below.

Figure 2 TDRA Risk Management Approach



5.1.3 Should the pre-application programme require update following implementation of any mitigation required to manage identified risks, updates to the pre-application programme will be communicated to key stakeholders and published on the Project website (Thames Water Utilities Limited, 2026), as outlined earlier in Section 2.

5.1.4 The development of the design and consents will be monitored. A series of Control Points have been and will continue be included in the programme at strategic points, for example when assurance is required prior to the DCO application submission.

6 Conclusion

6.1.1 This Programme Document has outlined the Project's intended approach to undertaking the main steps through pre-application stage. It is confirmed that the Project will proceed with the 'Standard' level of pre-application service with PINS.

6.1.2 This Programme Document will be maintained and updated by the Applicant to reflect any substantial changes and/or updates to the pre-application programme, and any future updates to this document will be publicised online on the Project website (Thames Water Utilities Limited, 2026).

6.1.3 For further information regarding the Project, please contact the Applicant via info.TDRA@thameswater.co.uk.

References

Documents and legislation referenced in the Programme Document are shown in the tables below.

Documents

Title	Document date
Department for Environment, Food & Rural Affairs (2023). Decision - Thames Water Teddington direct river abstraction: Section 35 Direction, Planning Act 2008. Accessed June 2026. https://www.gov.uk/government/publications/thames-water-teddington-direct-river-abstraction-section-35-direction-planning-act-2008	2023
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Title	Document date
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Legislation

Title	Document date
Planning Act 2008	2008, as amended
Planning and Infrastructure Act 2025	2025, as amended

Glossary

Term	Definition
Effluent (Trade Effluent)	Any liquid, either with or without particles of matter in suspension in the liquid, which is wholly or partly produced in the course of any trade or industry carried on at trade premises; and in relation to any trade premises, means any such liquid which is so produced in the course of any trade carried on at those premises, but does not include domestic sewage
Final Effluent	Wastewater that has had solids removed and is treated to meet struct regulatory standards ahead of being discharged to rivers and the sea
Recycled water	Final effluent that has been treated through enhanced treatment processes to remove further impurities to create recycled water
Wastewater	A combination of water from homes, business and rainwater from roads and roofs that is transported to and treated at sewage treatment works such as Mogden
Water Resources Management Plan	Regulatory requirement sets out how water companies intend to achieve a secure supply of water for their customers and protect and enhance the environment
Water Resources South East	An alliance of the six water companies that supply drinking water cross South East England

Acronyms

Acronym	Term
AoCM	Adequacy of Consultation Milestone
DCO	Development Consent Order
Defra	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
GLA	Greater London Authority
LPA	Local Planning Authority
LWR	London Water Recycling
MHCLG	Ministry for Housing, Communities and Local Government
PINS	The Planning Inspectorate
PMIE	Potential Main Issues for Examination
RAPID	Regulators' Alliance for Progressing Infrastructure Development
SoCC	Statement of Community Consultation
SRO	Strategic Resource Option
STW	Sewage Treatment Work
TDRA	Teddington Direct River Abstraction
TLT	Thames Lee Tunnel
TTP	Tertiary Treatment Plant
WRMP	Water Resources Management Plan
WRSE	Water Resources South East

Appendix A Pre-application programme (August 2026)

