

Teddington Direct River Abstraction Site Options Consultation

Feedback Report

Produced by Ipsos for Thames Water Ltd



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1 Executive Summary

1.1 The TDRA

Thames Water is planning a new river abstraction project, the Teddington Direct River Abstraction (TDRA), to provide up to 75 million litres of water daily during prolonged dry weather. The TDRA project is one of several being taken forward by Thames Water and its partners to help secure future water supplies.

It is intended that water will be taken from the River Thames upstream of Teddington Weir, transferred via a new pipeline to existing reservoirs for drinking water. Recycled water from Mogden Sewage Treatment Works would replace the abstracted water to maintain river levels and protect the environment. Usage would be limited to late summer to late autumn during dry periods. The TDRA is expected to be operational by 2033.

Thames Water has been conducting an initial process to evaluate potential sites for new structures, pipelines, and shafts required for the TDRA. This evaluation process involved weighing up the relative advantages and disadvantages of each site. As a result, Thames Water has identified initial preferred sites, and sought feedback through community engagement and a public consultation in autumn 2023.

1.2 Public consultation and engagement

As part of the early stages of designing and developing the TDRA, Thames Water undertook a non-statutory public consultation on site options. The consultation launched on **17 October 2023** and ran for eight weeks, closing on the evening of **11 December 2023**. The aim of the consultation process and wider stakeholder engagement was to seek feedback from a variety of stakeholders, including landowners, residents, businesses, local authorities and other statutory bodies who might be affected by or interested in the TDRA to help develop the proposals.

Thames Water commissioned the independent research agency Ipsos to receive, analyse and report on the feedback received. This report provides a summary of the feedback received to the public consultation. In total, **2,312 consultees** provided their feedback throughout the consultation period.

Thames Water publicised the consultation in a number of ways including in the press, on its website, and through running a number of events to provide details about the TDRA. A number of closed/pre-coded and open/freetext questions were asked on the response form. Such questions included background and classification questions, and specific questions about aspects of the TDRA, including about Mogden sewage treatment works (STW) as being the location for the proposed tertiary treatment facility and start of the pipeline; site shaft options; sites for discharge and abstraction; locations for a connection pipeline to the Thames Lee Tunnel; comments on the process undertaken to identify site options; other comments about the Project; and equality monitoring questions.

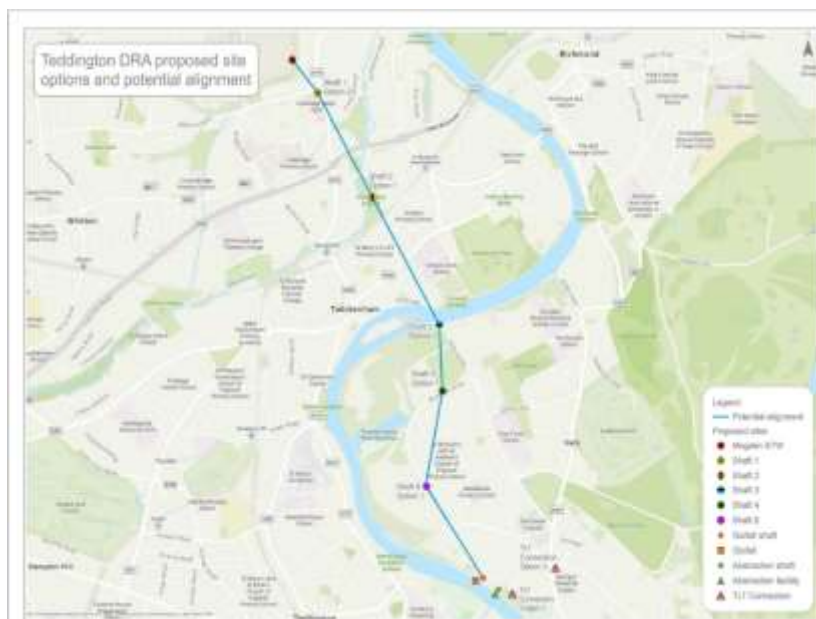
1.3 Summary of feedback received

1.3.1 Mogden STW as the location for the proposed tertiary treatment facility and start of the pipeline

A total of 522 consultees provided comments regarding the proposal to locate the tertiary treatment facility and start of the pipeline at Mogden STW. This included feedback from 510 individuals and 12 organisations and representative groups. Of these, 63 consultees offered positive comments, supporting the proposal for reasons such as making use of existing infrastructure, necessity, and potential improvements to the existing sewage treatment works. Conversely, 473 consultees expressed negative comments or raised concerns. These concerns included potential negative impacts on local communities, increased local traffic and travel disruption due to construction, negative socio-economic impacts, and concern about potential sewage discharge into local waterways. **Chapter 5** of the report delves deeper into the feedback received on Mogden STW as the proposed location for the proposed tertiary treatment facility and start of the pipeline

1.3.2 Site shaft options

There is the potential to use a number of different locations for pipeline shafts and their construction. Although not all locations may be required. Consultees were asked for their comments on site options for five¹ different locations for intermediate shafts as shown on the map. For each location, consultees were presented with the preferred option by Thames Water as well as other alternative locations and asked for their comments. Consultees provided their comments, including positive comments, as well as negative comments or concerns about each of the locations. **Chapter 6** of this report summarises the feedback received for all of the options presented, including preferred site locations and possible alternative locations.



1.3.3 Recycled Water Discharge and River Water Abstraction sites

Consultees were asked if there was anything Thames Water should take into account when selecting the sites for recycled water discharge and abstraction. Comments were received from 624 consultees, including 614 individuals and 10 organisations and representative groups. Seven consultees provided favourable comments, mostly contingent on conditions such as maintaining water quality and ensuring the structures were not visually intrusive. However, the majority (544 consultees) raised concerns or opposed the preferred sites, with 348 expressing general opposition, mainly due to fears of treated

¹ Intermediate shaft 5 – Thames Water have considered one option for the location of a fifth intermediate shaft, which has been removed as a more direct route has been identified. More details are available at <https://thames-wrmp.co.uk/news/documents/>

sewage being released into the River Thames and local watercourses. Other concerns included potential disruption from construction, perceived flaws in the proposal, and general disruption.

Additionally, 283 consultees were worried about negative effects on local communities, including impacts on recreational activities and river users, as well as health, quality of life, and wellbeing. Environmental concerns were also significant, focusing on harm to biodiversity, wildlife, habitats, water quality, and waterways. **Chapter 7** of this report summarises the feedback received about Recycled Water Discharge and River Water Abstraction sites.

1.3.4 Connection to the Thames Lee Tunnel Raw Water Main

For the connection pipeline to the Thames Lee Tunnel, a further shaft site would be required to facilitate a connection between the new pipeline and the existing raw water main. Two options are being considered for this: either land at Northweald Lane or at Tudor Drive. Consultees were asked to give their views on use of these two sites and the reasons for such views.

There were 325 consultees who provided comments about the proposal to locate the connection pipeline to the Thames Lee Tunnel at Northweald Lane or Tudor Drive. Comments were received from 319 individuals and six organisations and representative groups.

While there were a small number of favourable comments about both locations, most of the comments provided were negative. Concerns raised included worry about how local communities could be affected, concern about negative environmental impacts, and impacts to local traffic and travel during construction. **Chapter 8** of this report covers the feedback received about the connection to the Thames Lee Tunnel Raw Water Main.

1.3.5 Process to identify site options

The site options consultation document² summarises the site options that were subjected to detailed appraisal, the results of that work and current thinking regarding preferred sites at this early stage in the development of the Project. A number of key principles have informed the number of sites appraised and their location. Overall, Thames Water appraised 23 sites to locate different above ground features of the Project. Consultees were asked for their views and any information they could provide as part of ongoing consideration of the site options that have been identified.

Comments were received from 902 consultees. This included 868 individuals and 34 organisations and representative groups. A small number of those who made comments made favourable comments about the process undertaken to identify site options. However, the majority of comments were negative. Such comments included a belief that an environmental impact assessment should have taken place, that there had been a lack of consultation with local communities, a lack of assessment in terms of likely social impact or social value, that local communities had not been considered, that there was insufficient information, that the process was flawed or badly thought out, a belief that there has been a lack of

² [TDRA+Consultation+Report+V0.pdf \(dn9cxogfaqr3n.cloudfront.net\)](#)

transparency, and/or that the process was biased and unreliable. **Chapter 9** of this report covers the feedback received about the process to identify site options

1.3.6 Other comments

Most of those who participated in the consultation provided comments on the overall Project. Comments were received from 2,154 consultees. This included 2,116 individuals and 38 organisations and representative groups. Overall, 24 consultees provided favourable comments, while the majority (2,116 consultees) raised concerns or were opposed to the Project. In addition, 1,156 consultees made suggestions and noted considerations which they wanted Thames Water to take into account.

Of those who provided favourable comments about the TDRA, it was generally believed that it would be necessary, and that it would help prepare London for drought in future. There were also some comments of conditional support, including that it would be supported provided water quality was maintained, and that biodiversity, wildlife and habitats would not be adversely affected.

Negative comments and concerns received included general opposition, concern about discharge of sewage into local rivers and watercourses, concern about the track record of Thames Water, that the process was believed to be flawed or badly thought out, worry about impact of construction, and a view that Thames Water was prioritising profit and shareholders over the needs of local people. **Chapter 10** of this report covers the feedback received.

1.4 Conclusion and next steps

Feedback received from the public consultation will be considered by Thames Water as it seeks to develop designs for the proposed TDRA.

In December 2023, the Secretary of State confirmed that the TDRA should be treated as a project of national significance for which a Development Consent Order (DCO) is required. The DCO process provides opportunities for people to have their say on the proposals before a final decision is made by the Secretary of State. Before formally applying for a DCO, Thames Water must carry out public consultation and consider feedback.

Further consultation and engagement will be carried out by Thames Water over the next several years as it refines and develops its proposals to safeguard future water supplies.

2 Introduction

2.1 Overview

The public consultation was the first project-specific non-statutory consultation on the Teddington Direct River Abstraction (TDRA) project (the Project) and was focused on different site options. The TDRA forms part of a national portfolio of water resource solutions being progressed to ensure a reliable and resilient water supply is provided to water-stressed areas.

The proposed TDRA includes a new abstraction site on the River Thames, upstream of Teddington Weir, which is supported by recycled water. It is included in the Water Resources South East (WRSE) Regional Plan and Thames Water’s Water Resources Management Plan 2024 (WRMP24).

The WRMP24 sets out the requirement for drought resilience and identifies, along with WRSE, that a scheme able to deliver 75MLD is needed now, and that TDRA meets that need. The TDRA is expected to be operational in 2033 as illustrated in the timeline in Figure 2.1 below.

Figure 2.1: Proposed timeline for the TDRA



More details about the Project are provided by Thames Water on its website³.

2.2 Scope of the non-statutory consultation

As part of the early stages of designing and developing the TDRA, Thames Water undertook a non-statutory public consultation on site options. The aim of this consultation process and wider stakeholder engagement was to seek feedback from a variety of stakeholders, including landowners, residents, businesses, local authorities and other statutory bodies who might be affected by or interested in the Project to help develop the proposals.

³ [Document library - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://thames-wrmp.co.uk/)

The consultation was launched on 17 October 2023 and ran for eight weeks, closing at 23:59 on 11 December 2023. Consultees could take part via a number of advertised response channels including an online or paper questionnaire (response form), by email or by post. The response channels were:

- **Online:** <https://www.ipsos.uk/TDRA>
- **Email:** TDRA@ipsos.com
- **Post:** Freepost TDRA CONSULTATION

The independent research agency Ipsos⁴ was commissioned to receive responses, and to provide an independent report of the feedback received. This document provides a summary of the feedback.

Following the closure of the site options consultation, Thames Water will now review all feedback received, and will consult again at a later date on the details of the Project design and preliminary environmental effects through its statutory consultation process for the Project. In addition, Thames Water will engage on technical matters with the Environment Agency, local authorities and local interest groups as it progresses its studies.

2.3 Publicising the consultation

Thames Water publicised the consultation in a number of ways including in the press, on its website, and through running a number of events to provide details about the Project. Table 2.1 provides a breakdown of the date and location of each event, and the number of attendees.

Table 2.1: Consultation events and attendance⁵

Date	Venue	Number of attendees
3rd November 2023	York House, Twickenham	205
9th November 2023	Peter and Paul Centre, Teddington	125
13th November 2023	Twickenham Stadium	83
20th November 2023	YMCA Hawker, Kingston	330

⁴ <https://www.ipsos.com/en-uk>

⁵ Source: Thames Water

2.4 Number of responses received

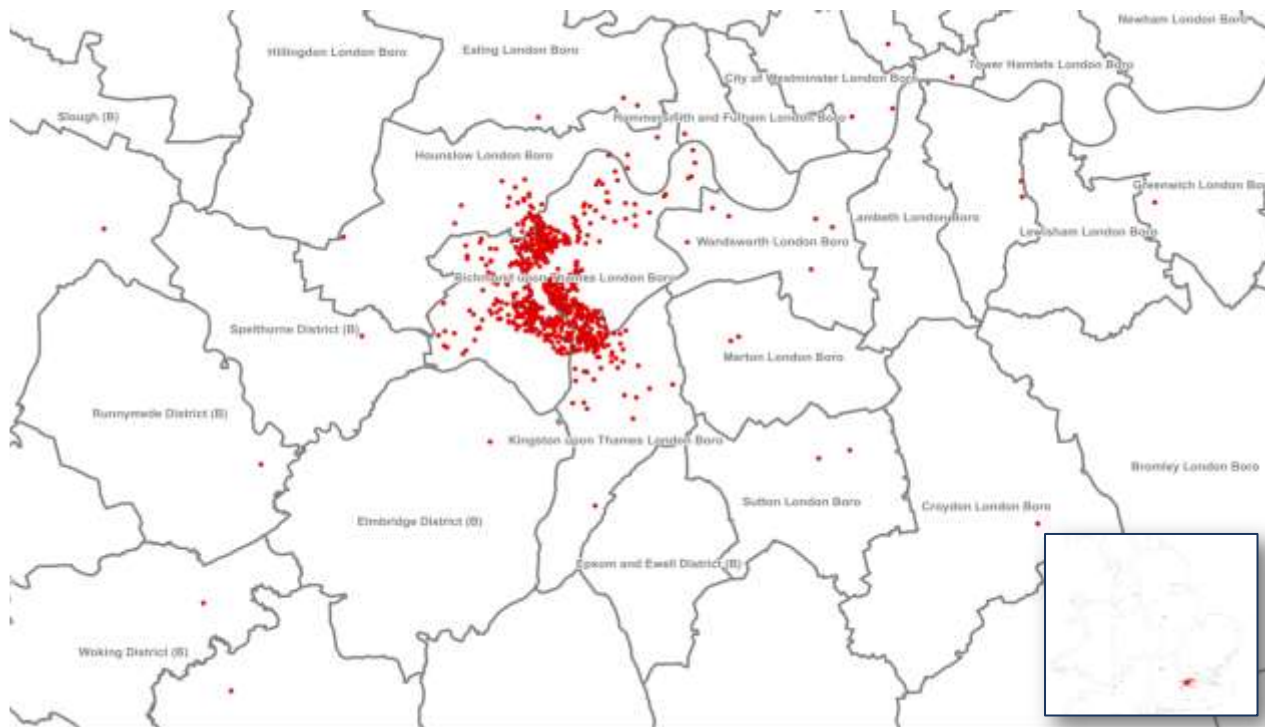
In total, **2,312⁶** consultees submitted a response to the consultation through the advertised response channels, as set out in Table 2.2 below.

Table 2.2: Responses received to the consultation by response channel

Response channel	Number of responses received
Online response form	941
Paper response form	26
Email	1,344
Whitemail ⁷	1
Total	2,312

Figure 2.2 provides a map to show the location of where consultees are located based on their postcode. Of all who provided a response to the consultation, the majority (1,815) provided their postcode (either full postcode or partial postcode) when completing the response form, or included it in their emailed/postal responses.

Figure 2.2: Map showing the postcode location of consultees



⁶ This excludes responses received after the consultation had closed on 11 December 2023. Responses received after the closing date were considered late responses and are briefly summarised separately in Chapter 10 of this report.

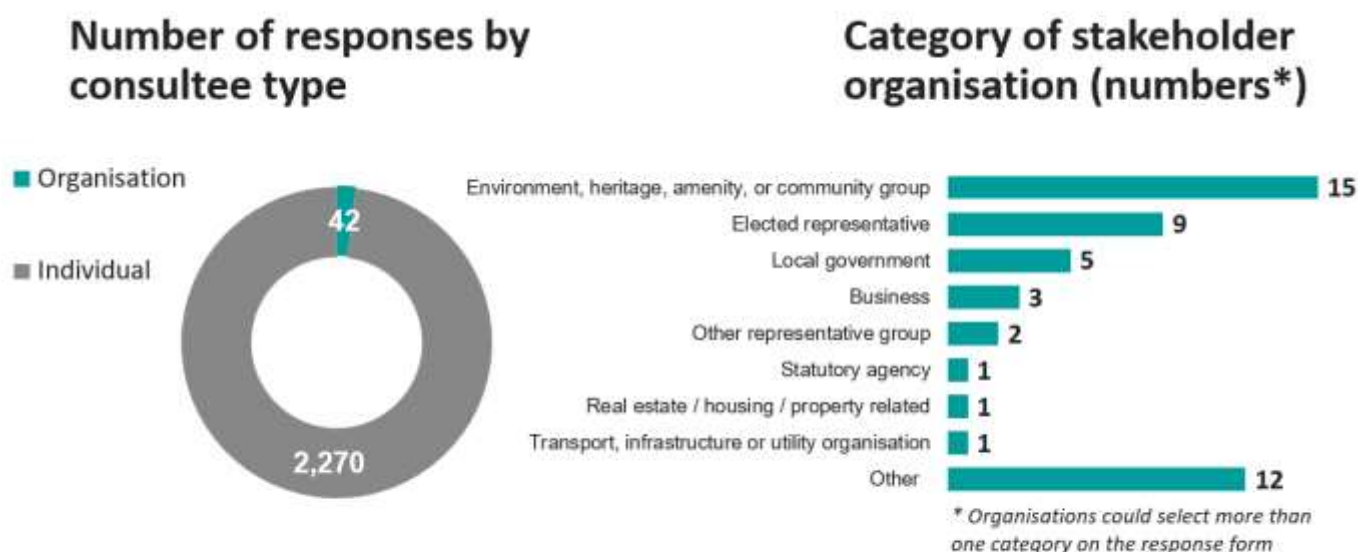
⁷ Whitemail responses are unstructured letters that are received via post.

Categories of consultee

Those who used the response form to provide their feedback were asked to indicate if their response was on behalf of a business or organisation. For responses received via email and whitemail, in the majority of cases, it was clear on whose behalf the response was from. Where this was less clear, and/or in cases where two or more responses were claiming to be on behalf of the same organisation, Ipsos used the best of its judgement to assign a response category, and/or to decide on which response was the official organisational response (when two or more responses were claiming to be on behalf of the same organisation), with the other response(s) re-categorised as responses from individuals.

Overall, the consultation received 42 responses from organisations and 2,270 responses from individual members of the public. Organisational responses are responses sent on behalf of wider groups rather than individual members of the public. Such organisations included businesses, local government organisations, elected representatives, and environmental, heritage and amenity groups. A breakdown is shown in Figure 2.3.

Figure 2.3: Breakdown of responses by category of consultee



2,312 consultees who provided a response to the consultation.
Consultation period: 17 October to 11 December 2023

42 consultees who provided a response to the consultation.
Consultation period: 17 October to 11 December 2023

A full list of the organisations who responded within the consultation period (excluding those requesting confidentiality) is found in Appendix A of this feedback report.

3 Structure of report

This report summarises the comments of those who responded to the consultation. The structure of this report is as follows:

Chapter 4 describes a summary of the analysis process. It provides details on how the responses were analysed.

Chapters 5 to 10 summarise the feedback received for specific parts of the proposed Project as follows:

- **Chapter 5** – Location for the proposed tertiary treatment facility and start of the pipeline at Mogden Sewage Treatment Works (STW)
- **Chapter 6** – Shaft Site Options
- **Chapter 7** – Recycled Water Discharge and River Water Abstraction Sites
- **Chapter 8** – Connection to the Thames Lee Tunnel Raw Water Main
- **Chapter 9** – The Process to identify Site Options
- **Chapter 10** – Other comments and feedback received. This includes comments about wider support or opposition to the overall Project, comments about the consultation, and perceived equalities impacts.

Chapter 11 provides a short summary of responses received after the consultation closed, and as such were considered *late responses*. In total **29** responses were received after the consultation had closed on 11 December 2023. In the interest of fairness to those who responded on time, late responses are treated separately in this report. All responses received (both on time and late⁸) have been securely transferred to the consultation team at Thames Water for their ongoing review and action accordingly. Thames Water reserve the right not to accept late responses in any future consultations.

Appendices includes a list of stakeholder organisations who responded to the consultation (excluding those who requested confidentiality); a profile of those who responded (where such information was provided); a copy of the response form; and a copy of the information leaflet about the consultation.

⁸ The latest response was received via email on 17 January 2024 – over five weeks after the close of the consultation on 11 December 2023.

4 Analysis methodology

4.1 Receipt and handling of responses

The handling of responses to the consultation was subject to a process, run by Ipsos, of checking, logging and confirmation to ensure a full audit trail. All original electronic and hard copy responses were securely filed, catalogued and given a serial number for future reference, in line with requirements of the Data Protection Act 2018 and General Data Protection Regulations (GDPR).

4.2 Analysis of responses

The process of analysing the content of each response was based on a system where unique summary 'codes' are applied to specific words or phrases contained in the text of the response. The application of these summary codes and sub-codes to the content of the responses allows systematic analysis of the data.

Ipsos developed an initial coding framework (i.e. a list of codes to be applied) based on the text of the first responses received. This initial set of codes was created by drawing out the common themes and points raised. The initial coding framework was then updated throughout the analysis process to ensure that any newly emerging themes were captured. Developing the coding framework in this way ensured that it would provide an accurate representation of what consultees said.

Ipsos used a web-based system called *Ascribe* to manage the coding of all the text to open/free-text question responses (including those received offline). Ascribe is a system which has been used on numerous large-scale public consultations. Responses were uploaded into the Ascribe system, where members of the Ipsos coding team worked systematically through the comments and applied a code to each relevant part(s) of them.

The Ascribe system allowed for detailed monitoring of coding progress and the organic development of the coding framework (i.e. the addition of new codes to new comments). A team of coders worked to review all of the responses as they were uploaded to the Ascribe system. The coding team was fully briefed on the scope of the consultation before they commenced work.

To ensure that no detail was lost, coders were briefed to raise codes that reflected the exact sentiment of a response, and these were then collapsed into a smaller number of key themes at the analysis stage to help with reporting. During the initial stages of the coding process, weekly meetings were held with the coding team to ensure a consistent approach in raising new codes and to ensure that all additional codes were appropriately and consistently assigned.

When analysing responses, coders (and report writers) used their best judgement to determine if the response was about a specific aspect of the TDRA, or about the TDRA more generally. In some cases it was not possible to be certain if a response was about a specific aspect of the Project, or wider than this. If Ipsos considered a response to be about a specific aspect of the Project, this is reported on in the relevant chapter of this document.

4.3 Interpreting the consultation findings

A public consultation is a valuable way to gather opinions about a topic, but there are a number of points to bear in mind when interpreting the responses received. While the consultation was open to everyone, those who provided a response were self-selecting, and certain categories of people may have been more likely to contribute than others. This means that the responses can never be 'representative' of the population as a whole, as would be the case with a representative sample survey.

Typically, with any consultation, there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. Responses are also likely to be influenced by local campaigns.

It must be understood, therefore, that the consultation, as reflected through this report, can only aim to catalogue the various opinions of the members of the local community and organisations who have chosen to respond to the consultation. It can never measure the exact strength of particular views or concerns amongst members of the local community, nor may the responses have fully explained the views of those responding on every relevant matter. It cannot, therefore, be taken as a comprehensive, representative statement of opinion.

While attempts are made to draw out the variations between the different audiences, it is important to note that responses are not directly comparable. Those who have provided their feedback will have chosen to access differing levels of information about the Project. Some responses are therefore based on more information than others and may also reflect differing degrees of interest.

It is important to note that the aim of a public consultation is not to gauge the popularity of a proposal or proposals; rather it is a process for identifying new and relevant information that should be considered in the decision-making process. All relevant issues are, therefore, considered equally, whether they are raised by a single consultee or a majority of consultees. A consultation is not a referendum.

4.4 Respondents vs. comments made

Please note that throughout the report, findings are reported on in terms of the number of consultees (or respondents) who made comments, and/or the number of comments made. It is important to bear in mind that a consultee can make both positive and negative comments, as well as suggestions and other comments. When numbers are mentioned, the report makes clear that this is either the number of consultees who made comments, or the number of comments made. This will explain why for example that the number of comments made will generally add up to more than the number of consultees who made comments. It is important to bear this in mind when interpreting the consultation findings.

4.5 Organisational responses

Those who responded on behalf of an organisation or group were classified as *stakeholder organisation* responses. Those classified as stakeholder organisations included statutory agencies, elected representatives, community groups, local government organisations (including county, district, parish and town councils), and businesses.

The response form asked consultees to indicate whether they were responding on behalf of a business or organisation, or as an individual. Those who said they were responding on behalf of a business or organisation were generally classified as a stakeholder organisation, unless it was clear from their response that their comments were on their own behalf, and as such, responses were categorised as responses from individuals.

The response form asked stakeholder organisations to indicate the category of organisation they felt best described themselves from a pre-determined list. For the purposes of consistency of reporting, Ipsos has occasionally chosen to reallocate stakeholder organisations to a different category to the one that they self-selected. However, participants' own selections have been largely respected. Stakeholder organisations that responded by email were allocated to categories by Ipsos, to the best of its judgement.

A full list of the organisations that took part (excluding those requesting confidentiality) can be found in Appendix A.

4.6 General public responses

Those who said they were providing their own response in the online and paper response form were generally classified as members of the public, unless it was clear from their response that they were responding on behalf of a group or organisation (i.e. they self-identified as such on the tick-box question on the response form). Those who responded by email or letter (i.e. not by use of the online response form) were classified as members of the public, unless it was clear that they were responding on behalf of an organisation or group.

Where two or more responses were received from the same organisation, Ipsos reviewed each response and made a decision as to which was the official response and which was not. Those that were considered not to be representing the organisation were then categorised as responses from individuals / members of the public. Their responses are still included in the report, but not attributed to the organisation they were claiming to be responding on behalf of. There cannot be more than one official response from an organisation.

5 Location for the proposed tertiary treatment facility and start of the pipeline at Mogden Sewage Treatment Works

5.1 Overview

In the consultation material, Thames Water identified Mogden Sewage Treatment Works (STW) as the preferred location for the proposed tertiary treatment facility and start of the proposed pipeline. Consultees were asked to provide their comments on the use of Mogden STW for these structures and reasons for their views.

5.2 Summary of feedback received

There were 522 consultees who provided comments in response to the proposal to locate the tertiary treatment facility and start of the pipeline at Mogden STW. Comments were received from 510 individuals and 12 organisations and representative groups. Some consultees took the opportunity to express their views about the proposals as a whole, rather than to specifically answer the questions asked. Overall, 63 consultees provided favourable or receptive⁹ comments about this proposal, while 473 consultees provided negative comments or raised concerns. Table 5.1 includes the number of consultees who made comments, with those making negative comments or raising concerns broken down further by key theme.

Table 5.1: Number of consultees who made comments broken down by category / theme

Category / theme	Number of consultees providing comments
Favourable/receptive comments (overall)	63
Negative comments and concerns raised (overall)	473
<i>General negative comments and concerns</i>	390
<i>Environmental impacts</i>	273
<i>Concerns about how local communities might be affected / impacted</i>	208
<i>Traffic and travel issues</i>	44
<i>Socio-economic impacts</i>	14

⁹ Receptive comments are defined as comments considered to be supportive of the proposal/s.

The next sections of this chapter examine the reasons put forward in support of, or opposition to the proposal to locate the tertiary treatment facility and start of the pipeline at Mogden STW.

5.2.1 Favourable / receptive comments

Of the 63 consultees who provided favourable or receptive comments, this included general support (24), support for the proposal because it could utilise existing infrastructure (15), that it would be necessary (5), or that it could improve the existing sewage treatment works (4).

"Mogden is an important and necessary facility and it seems sensible that it is used for this purpose."

Member of the public

Others who provided comments indicated that they would be in support of the proposal (or would not object to it) provided certain conditions would be met. This included that they would support the proposal provided it would not result in any untreated sewage leaks (5), that the impact of construction could be mitigated, including the planting of trees to replace those lost (2), or that water quality could be maintained or even improved (2).

"I don't have any objection to this plant in particular provided there is no escape of raw sewage."

Member of the public

"It would be preferable to minimise tree loss and to replace any that have to be lost with additional tree planting in appropriate positions within the site."

Thames River User Group 8

5.2.2 Negative comments and concerns raised

There were 473 consultees who provided negative comments and/or raised concerns. This included 390 consultees who made negative comments in general, 273 who were concerned about negative environmental impacts, 208 who were worried about how local communities could be affected, 44 who were concerned about impacts to local traffic and travel as a result of construction, and 14 who were worried about negative socio-economic impacts.

A key concern was a belief that the proposal could result in sewage discharge into local waterways and watercourses (112 comments).

"To date, Mogden has proved not fit for purpose, as it fails to handle current requirements and is the largest discharger of sewage into the Thames. There is no confidence that it can cope with this new scheme."

Member of the public

Other comments were focussed on general concerns about the impact of construction (46), or concern that the proposed site at Mogden STW was too small or unsuitable (43).

“Unfortunately, Thames Water has repeatedly stated that space restrictions at Mogden will limit the level of water treatment possible at the site. Should higher levels of treatment become necessary as population density increases and water quality declines, it may put the future utility of the project into question.”

Sarah Olney, MP for Richmond Park

Other less frequently cited general concerns included that the proposal was lacking in detail (17), that what was proposed was believed to be impractical as the location was thought to be too far away from where it would be needed (16), that it wasn't necessary (15), or that it was a waste of money (10).

Environmental impacts

There were 273 consultees who were concerned about the potential for the proposal to harm or negatively impact the environment. The main comments received included worry that biodiversity, wildlife and habitats could be negatively affected (83), perceived impacts on water quality (48), on local waterways and rivers (48), and/or impact on open or green spaces (38).

Other less frequently raised concerns included that what was proposed could result in noise pollution (15), that protected areas and woodlands could be affected (13), worry or concern about chemicals being released into local waterways (12), that water temperature could be increased or changed (9), and that local heritage sites and those of historical interest could be negatively impacted (4).

“This Site of Importance for Nature Conservation contains deciduous woodland priority habitat, some of which may need to be removed and for the duration of the development there will be a loss of Local Open Space.”

Richmond & Twickenham Friends of the Earth

“Strongly disagree with the use of Mogden STW at the Thames in Teddington. The sewage water is as you say “highly treated” which will no doubt involve a serious amount of chemicals...”

Member of the public

Community impacts

There were 208 consultees who were concerned about how the proposal could affect local communities. The main comments received included general concerns about impacts on local communities (106), that those who undertake leisure activities on the River Thames could be affected (76), that local schools and schoolchildren would be disrupted (52), and concerns about people's local health and wellbeing (42).

Other, less frequently cited comments about how local communities and local people could be affected by the proposal included named specific local areas including Moormead, St. Margarets, Teddington, Richmond, and Kingston.

"We've had historic problems with Mogden, primarily regarding having to live with the stench emanating from the site...any work carried out at the site is bound to stir up this problem. Cole Park Road and St Margarets is a small oasis and we are concerned that any work done at the Mogden site will reignite the original problem we've just described, which in recent years has improved and been less frequent.."

Member of the public

Travel and transport issues

There were 44 consultees who raised concerns about local travel and transport as a consequence of the proposal at Mogden STW. Concerns were raised about how the proposal could result in increased traffic and traffic congestion, including impact of construction traffic and HGVs (24), that traffic and congestion could be increased in general (15), and that specific settlements including Isleworth (6), Moormead (6), and Twickenham (1) could be impacted.

"I find it hard to comprehend why a facility in such close proximity to not only a huge residential area but also the requirement for further works in areas that are wholly inappropriate to be worthy of consideration due to the totally negative impact these works will have on residents, the increased traffic, loss of green spaces and areas for local residents to enjoy and environmental damage/ impact"

Member of the public

Socio-economic impacts

There were 14 consultees who were concerned that the proposal could negatively impact local businesses. This included 12 comments about how local businesses could be affected, and two comments about how visitors could be dissuaded from visiting the local area.

"I am opposed to the facility for several reasons...This would naturally impact the schools and local businesses."

Member of the public

6 Shaft Site Options

6.1 Overview

As part of the proposed Project, new pipelines would be needed to transfer water to the outfall structure and from the intake structure, both located upstream of Teddington Weir.

A new pipeline, approximately 4.5km in length, would transfer recycled water from the newly built tertiary treatment facility located in Mogden STW, to an outfall structure approximately 180 metres upstream of Teddington Weir.

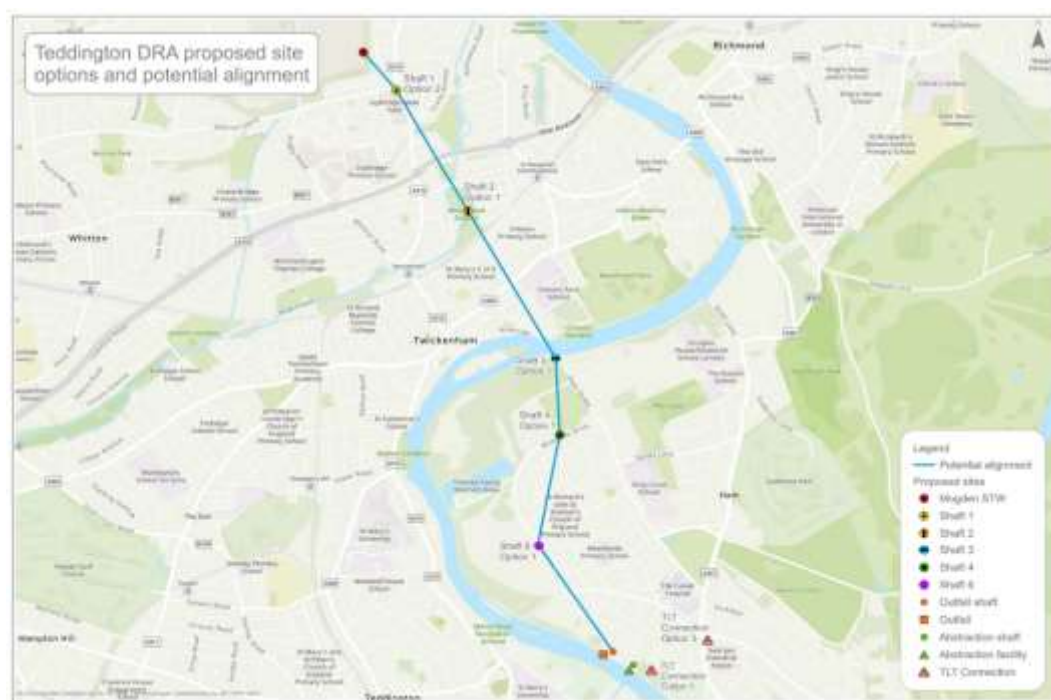
Another new pipeline would then transfer river water from an intake structure approximately 350 metres upstream of Teddington Weir to the existing Thames Lee Tunnel.

In most places the consultation material proposed that this pipeline would be between 20 and 30 metres deep and 1.8 metres wide.

The consultation material noted that up to six shafts could be required at points along the pipeline route between Mogden STW and the outfall structure depending on the route and site options selected following public consultation. The shafts are required for access by the construction team and its equipment and machinery needed for construction of the pipeline. During construction, each shaft would measure approximately 10.5m in diameter. Once construction is complete, a 2m x 2m cover for the shaft access point would remain.

Consultees were asked to comment on site shaft options for five intermediate shafts in different locations. The locations are depicted in figure 6.1 below.

Figure 6.1: locations of intermediate shafts



6.2 Summary of feedback received

6.2.1 Intermediate Shaft 1

Thames Water is considering three options for the location of the first intermediate shaft. These are:

- **Ivybridge Retail Car Park (north)** – the preferred site
- **Ivybridge Retail Car Park (south)** – an alternative site
- **Land between Summerwood Road and Ivybridge Retail Park** – an alternative site

Consultees were asked to comment on each of the site options (preferred and alternatives), and the reasons for their views. While Ivybridge Retail Car Park (north) is the preferred site, another two sites could be alternative sites as the location of the first intermediate shaft.

Many of those who provided comments tended to make quite general statements in favour of, or opposition to site shaft options in general, rather than making comments specific to each of the site options. Furthermore, of those who provided favourable or receptive comments, most tended to focus on the car park overall rather than more specifically on either the north or south car park.

In total there were 315 consultees who provided comments about the proposed location for the first intermediate shaft. This included comments from 308 individuals and seven organisations and representative groups. The next section provides a summary of the comments that were made.

Favourable / receptive comments

Overall, there were 30 consultees who provided favourable or receptive comments without specifying which of the three site options they preferred. This included 12 comments in favour of “a” car park location without specifying further, five comments that “a” car park location would ensure that green spaces and the environment are not impacted, and three comments that “a” car park site would be most suitable as it is already in a built-up area. There were also seven comments about all three of the locations being suitable.

“Ivybridge Retail Park would be less disruptive because it is a car park not a park where children play.”

Member of the public

“Ivybridge Retail Car Park (north) and (south) are our preferences for their minimal ecological damage they would cause.”

London Wildlife Trust

There were, however, 15 consultees who made favourable or receptive comments specifically about **Ivybridge Retail Car Park North**, which is the preferred site option. There were eight comments in support of this location because it was believed it would be less intrusive and/or would minimise disruption, while there were also five general favourable comments, and single comments that wildlife, the environment, local communities and/or green spaces would not be affected if the intermediate shaft was constructed at this location.

"Using car parking (Ivybridge North) would seem sensible to avoid undue disruption to residents."

Member of the public

There were nine consultees who provided favourable or receptive comments about **Ivybridge Car Park South**. Comments received included four comments that disruption would be minimised, three generally favourable comments without specifying further, and single comments that wildlife, the environment, and local communities would not be affected.

Five consultees made favourable or receptive comments about using **land between Summerwood Road and Ivybridge Retail Park**. This location was generally believed to be the least disruptive to shoppers and others using Ivybridge Retail Park, as well as being the most economic option.

"Both retail car parks are already very congested and this will make things worse. It will put shoppers off using the shops and the retailers will require compensation which will be a significant additional cost. The Summerwood Road site seems a better option."

Member of the public

Negative comments and concerns raised

Some 270 consultees made negative or opposing comments and/or raised concerns about the proposed location for the first intermediate shaft. This included 216 consultees who made general negative or opposing comments about this proposal, 84 who were concerned about how local communities could be negatively affected, 62 who were worried about environmental consequences, 60 who were concerned about how local traffic and transport could be affected, and 35 cited socio-economic shortcomings that they believed would be associated with the proposal.

As with those who provided favourable/receptive comments, the majority of those who made negative comments or who raised concerns tended to make overall statements about the site shaft options rather than specifically about each of the three potential locations for the siting of the first intermediate shaft. Of 216 consultees who made general statements, there were 144 comments that 'none of the proposed locations' would be suitable, 33 comments about disruption, 20 comments about the likely impact of construction, and 10 comments that the TDRA project wasn't necessary.

"I fundamentally object to the proposal to abstract water from the Thames in the way that is described and so cannot support the sinking of any shaft."

Member of the public

Of 84 consultees who raised concerns about how local communities could be affected, again, comments tended to encompass all three locations together rather than specific community impacts at each of the three potential locations. The main comments received were concerns in general about community impacts (50), that residential areas would be negatively affected (27), that recreational and leisure activities could be disrupted (13), that local settlements would be affected (12), and that local schools and schoolchildren could be negatively affected too (10).

"I strongly oppose to any of these locations due to the negative impact on neighbourhoods and wildlife. The works will cause a lot of disruption to residents for a long period of time."

Member of the public

There were 62 consultees who were concerned about overall environmental impacts. The main comments received included that the local environment could be impacted (20), negative consequences for local wildlife and habitats (16), concerns about air quality/dust as a result of construction (11), impact on green/open spaces (10), and how local waterways and watercourses, including the River Thames could be affected (10).

"...I believe this proposal is not right for our community, not right for the river, and not the right plan for London. I also believe this would have a huge impact on local wildlife, including badgers, insects, birds and fish."

Member of the public

Sixty consultees raised concerns or were opposed to this proposal overall because of what they believed would result in consequences for local travel and transport. The chief comments made in this regard centred around increased traffic congestion throughout the construction period (30), loss of car parking space (23), and negative impacts of construction traffic in general (14).

"There is very little parking in this area and to lose spaces is not acceptable. Halfords especially depends on customers being able to park outside their shop."

Member of the public

"London Borough of Hounslow has significant concerns as to the potential traffic impacts from all of the proposed sites. Mogden Lane and Twickenham Road are both classified roads and bus routes and already experience high traffic volumes resulting in significant queuing past the site, particularly in the AM and PM peaks."

The London Borough of Hounslow

There were 35 consultees who were concerned about the overall impact of this proposal on the local economy, including negative consequences for local businesses.

"I object to the Ivybridge Retail Car Park north and south locations, and the land between Summerwood Road and the Ivybridge Retail Park for pipeline shaft construction due to the unnecessary disruption to retail businesses."

Member of the public

Some consultees raised concerns or were opposed to one or more of the proposed locations specifically. This included 16 consultees who provided negative comments about **Ivybridge Retail Park North**, 15 consultees who provided negative comments about **Ivybridge Retail Park South**, and four consultees provided negative comments or raised concerns about the **location between Summerwood Road and Ivybridge Retail Park**.

Ivybridge Retail Park North

There were 16 consultees who raised concerns about the preferred location for the first intermediate shaft because they felt this had consequences for local travel and transport. The main comment was that the car park was a busy and necessary car park for those using the retail park (10). There were also five comments that parking availability would be reduced, two comments about additional traffic congestion, and a further two comments that construction traffic would lead to increased traffic congestion. There was also one comment about concern of the impact of the proposal on local transport infrastructure.

"These areas are already heavily congested with traffic through the day. An increase in trucks extracting materials will create further disruption and pollution into the neighbourhood."

Member of the public

There were also four consultees who raised concerns about the impact of the proposal on local communities, three raised general concerns, two were concerned about how local businesses could be affected, and one consultee had concerns about environmental impacts as a consequence of building the first intermediate shaft in the preferred location.

"...(we are) the freeholder of two of the locations ('Ivybridge Retail Car Park' (north and south) being considered for the shaft. We object unreservedly to the use of Ivybridge Retail Park's car parks being used, which would be devastating for the retail trade of the business occupying the units."

Coal Pension Properties Ltd

Ivybridge Retail Park South

There were 15 consultees who raised concerns or who were opposed to the siting of the first intermediate shaft at Ivybridge Retail Park South. As with concerns raised over the preferred location, most of those who made comments were concerned about the loss of car parking availability. There were nine comments that the car park is currently well used and busy, two comments about concern over how local transport infrastructure could be affected, as well as two comments about reduced car parking availability, congestion, and impact of construction traffic. Additionally, four consultees were concerned about how local communities could be affected, and three consultees had general concerns or were opposed to the proposal.

"Ivybridge North and South. Great, run it straight through the car park of our closest supermarket and retail park. Right next to a highly densely populated area."

Member of the public

Land between Summerwood Road and Ivybridge Retail Park

Four consultees were concerned about locating the first intermediate shaft on land between Summerwood Road and Ivybridge Retail Park. This included two consultees who were concerned about environmental impact, two consultees who were worried about how local communities could be affected, and two who raised general concerns or were opposed to this site option.

"...use of the common ground between Summerwood Road and Ivybridge Retail Park should be avoided due to the impact on local residents."

Member of the public

6.2.2 Intermediate Shaft 2

Thames Water is considering two options for the location of the second intermediate shaft. These are:

- **Moormead and Bandy Recreation Ground (central)** – the preferred site
- **Moormead and Bandy Recreation Ground (south)** – an alternative site

As with proposals for site options for the first intermediate shaft, consultees were again asked for their views on the use of these sites and reasons for their views. In total, 550 consultees provided comments about the siting of the proposed second intermediate shaft. This included comments from 535 individuals and 15 organisations and representative groups. The vast majority of comments received were negative, with 536 consultees raising concerns or opposing the second intermediate shaft proposal outright. Comments received are summarised in the next section of this report.

Favourable / receptive comments

There were five consultees who made general favourable comments about the second intermediate shaft site options. Such comments included a view that both site options would be suitable (two comments), as well as conditional support on provision that Moormead and Bandy recreation ground would not be negatively affected (two comments), and single comments that the proposal would be acceptable provided Teddington was not adversely affected, and if the site could be closer to the perimeter rather than further into the recreation ground.

"...why does the site have to be so far into the centre of the recreation ground? Could it not be at the northern end of the ground, south of the trees along Hill View Road...this would appear to have less of an impact on the recreation ground and require a much shorter access track."

Member of the Public

Of those who made specific comments about the site options, eight consultees provided favourable or receptive comments about the preferred site. There were five favourable comments in general, and three comments that it would be the best option as it would keep disruption to a minimum, and be less intrusive than the alternative site.

"I would agree with your current preferred site. Please bear in mind that the park hosts a junior parkrun every Sunday."

Member of the public

On the other hand, eight consultees provided favourable or receptive comments about the alternative site. There were three comments that disruption would be minimised, three comments that disruption to residential areas would be reduced, one comment of general support, and two comments with conditional support provided public access to the recreation ground would be maintained.

"I am thinking that you mean 'Moormead'? This is a heavily used and popular park. The shaft in my view should be sited nearest to the railway line - the alternative site and not in the middle of the park (preferred site). This still, I would hope permit (sp) use of the park?"

Member of the public

Negative comments and concerns raised

As previously mentioned, the vast majority of those who provided comments on the site options for the second intermediate shaft were negative. Most of those who provided comments were opposed to the proposal outright – including 321 comments about "none of the options" being suitable.

The club...strongly opposes both the preferred and alternative options set out by Thames Water. We urge Thames Water to reconsider its plans, and specifically to consider alternative routes/sites if the pipeline option goes ahead, and ask the London Borough of Richmond, as the local planning authority, to ensure that damaging development work cannot go ahead in Moormead Park."

Moor Mead Football Club

"Moormead Park is a key local amenity for residents, schools and local clubs. The damage the construction work and its legacy would do to the social cohesion of our community mean neither Option 1 nor Option 2 are acceptable."

Cllr Katie Mansfield, St Margarets and North Twickenham Ward

Other frequently made comments included concern about the impact of construction (85), disruption (81), and vibration (23).

"I fundamentally object to the proposal to abstract water from the Thames in this way and cannot support the construction of any intermediate shaft."

Member of the public

"The Moormead site proposals are unfair and unacceptable. The alternative to the Thames Water preferred Option 1 is a second choice that merely builds off the total destruction of the first one. Both proposed options are confined entirely within a public recreational space and unfortunately both are park destroyers. Option 2 is listed as CODE RED from a planning feasibility perspective so ostensibly takes itself off the list anyway."

Moormead Cricket Club

There were 374 consultees who were concerned about how local communities might be negatively affected. Comments received included concern about how communities in general could be impacted (244), negative impacts on local schools and schoolchildren (206), how the recreation ground for leisure and sports activities could be affected (145), and negative effects on people's quality of life and wellbeing (100).

"I am strongly opposed to the use of either location in Moormead and Bandy Recreation Ground for this shaft. It is central to community life, where children play, local sports take place, people walk their dogs and core to living in this area."

Member of the public

"St Stephen's children use Moormead Park every day for games and the park is integral to our delivery of the national curriculum. Like many other schools in London we do not have the facilities on site in order to deliver the curriculum and so rely on Moormead."

St. Stephen's School

"...the construction of the access shaft (Option 1) would have a significant impact on the community and environmental value of Moormead Park, as well as the surrounding roads and homes, over many months and even years. Selecting Option 2 for the shaft would have further detrimental impacts on the new riverside access path linking the park to Twickenham Station."

FORCE

"We believe Moormead Recreational Ground to be an incredibly poor choice of location for a major infrastructure project."

Moormead Cricket Club

Perceived environmental impact was a concern for 279 consultees. Chief concerns were about how Moormead and Bandy Recreational Ground could be negatively affected or damaged, with 97 comments received about this. There were also 91 comments about impact to open and green spaces, 78 comments about general environmental impact, 64 comments about reduced air quality and air pollution as a result of construction, and 63 comments that biodiversity, wildlife and habitats could be damaged or destroyed.

"This plan to cause disruption to a local park, child's play area and local wild life, not to mind the disruption to households for several years is absolutely atrocious and I couldn't object to it more strongly."

Member of the public

There were 140 consultees who believed that the second intermediate site options would have consequences for local transport and travel. There were 87 comments raising concerns about the effect of HGV and construction traffic, 54 comments about how local transport infrastructure could be affected, 38 comments about how an increase in traffic could cause safety issues, 37 comments about access, and 33 comments in general about how the proposal could increase traffic congestion.

"Both these locations are inappropriate when they are used as a school field by more than one school. There is poor access for construction vehicles and an alternative scheme has not been considered or been discussed in public."

Member of the public

There were also 22 consultees who believed that the proposal could negatively impact the local economy, local businesses and jobs. This included a view that the viability of St. Margarets Fair could be called into question, with knock-on negative consequences for the local economy and community.

"This is a completely unacceptable area to be digging up. It's a lovely, well-used and well-loved local park that is the site of the St Margarets Fair...without the fair, schools would lose thousands of pounds on donations at a time when budgets are incredibly tight....I absolutely oppose BOTH options."

Member of the public

"St. Margarets Fair will be unable to hold its annual event for 3-4 years as the park will become unusable."

A representative of St. Margarets Fair

In addition to large-scale opposition to both of the potential site options, some consultees provided specific comments on each of the two site options. There were 14 consultees who specifically mentioned they were opposed to the preferred site option. This included 10 who were opposed in general because of perceived negative consequences, nine who were concerned about how local communities would be affected, two about environmental impact, and two about negative impacts on local travel and transport.

There were also nine consultees who provided specific comments in opposition to the alternative site option, or raised concerns about it. As with concerns raised about the preferred site location, these included how local communities would be impacted, environmental damage, and increased traffic and congestion.

In the majority of cases, consultees who were negative or opposed to one location tended to also be negative about the other location as well. It wasn't usually a case that one location was supported and one location was opposed. Usually, if consultees had concerns with one of the locations, they tended to also have concerns about the other location as well.

"Both sites are disastrous for the recreation ground, particularly the south site, where the access road will run through the whole area and cause massive damage."

Member of the public

6.2.3 Intermediate Shaft 3

Thames Water is considering two options for the location of the third intermediate shaft. These are:

- **Ham Street Car Park** – the preferred site
- **Land to the south of Ham Street Car Park and west of Ham Street** – an alternative site

Overall, 488 consultees provided comments on site options for the third intermediate shaft. This included comments from 480 individuals and eight organisations and representative groups. Most comments received were negative or opposing comments. Few consultees provided favourable or receptive comments about these site options. Comments received are summarised in the next section of this report.

Favourable / receptive comments

There were 12 consultees who provided general favourable comments about the proposed siting of the third intermediate shaft. Comments made included that both site options would be suitable (3), that housing and residential areas would not be substantially impacted (3), or that it was necessary (1). There were also a few comments of support provided certain conditions would be met, including that pedestrian access was maintained, that it would be supported provided the Ham Lands Nature Reserve was preserved, or that so long as Moormead and Bandy Recreation Ground would not be impacted.

There were 17 consultees who provided favourable or receptive comments about the preferred site. Such comments included that disruption could be kept to a minimum or less than the alternative option (7), that green spaces would not be affected or damaged (2), and that it could allow excavated materials to be removed via waterway (2). There were also four comments of support provided impacts of construction would be mitigated.

"Ham Street Car Park would be a logical site, as long as half of the car park was retained for members of the public visiting the area and needing to park."

Member of the public

"Apart from the potential of flood risk, we support Option 1: Ham Street Car Park, due to its current land use would result in less damage to existing ecological assets."

London Wildlife Trust

Ten consultees provided favourable or receptive comments about the alternative site. This included general support (4), and that it would be less intrusive or keep disruption to a minimum (4). There were also single comments of conditional support subject to environmental assessment, and/or archaeological assessment.

"I have a strong preference for Option 2 subject to satisfactory environmental and archaeological surveys."

Member of the public

Negative comments and concerns raised

As with other potential locations for intermediate shafts, most of the comments received about the third intermediate shaft were negative. There were 352 consultees who said they were opposed to the proposal in general, or had general concerns about the impact of the proposal. Most of the comments received stated that neither of the two options would be suitable (265 comments). Other comments centred around impact of construction (45) and disruption (34).

"Work in this area would be extremely disruptive - proximity of Ham House already has a significant impact in the area due to traffic. Ham St is one of the few car parks in the area providing direct river access. Serious concerns about the environmental impact on both of these locations."

Member of the public

There were 196 consultees who were negative about both of the proposed locations for the siting of the third intermediate shaft because they were concerned about how local communities could be impacted. There were 83 comments about impacts on local people and local communities, 59 comments about how people's leisure activities could be disrupted, 29 comments about impacts for river users, 26 comments about consequences for Ham Village, 23 comments about impacts on local towns and villages generally, and 20 comments about how local schools and schoolchildren could be affected.

"I object to both locations as sites for the third intermediate shaft due to unnecessary disruption to valuable parking space for residents and river users, and noise pollution for people seeking to enjoy the river at Ham, Ham Lands and visitors to Ham House. Furthermore, I object to the whole project of Thames Water extraction at Teddington...."

Member of the public

Perceived environmental impacts were a concern for 241 consultees. The main comments received included concern about how biodiversity, wildlife and habitats could be damaged (69), impacts to historical sites including Ham House (50), general concerns about environmental impacts (42), worry about how Ham Lands Nature Reserve could be affected (39), concern about pollution and damage to local waterways and watercourses (36), and how green spaces could be damaged (26).

"I strongly object to these locations, given the close proximity to Ham House. This will have an extremely negative impact on visitor experience and raises the risk of damage to the property."

Member of the public

"Shaft 3 - Ham Street Car Park - flood risk area and this site is within the Ham House Conservation Area and parts of the site are within Archaeological Priority Areas. Deciduous woodland and native hedgerows along the boundaries of the site are the habitat of bats, birds, and potentially badgers and stag beetles."

Richmond & Twickenham Friends of the Earth

There were 87 consultees who raised concerns or who were opposed to the proposal because it was believed to have negative consequences for local travel and transport. There were 36 comments about how car parking availability would be reduced, that traffic congestion would increase due to HGV and construction traffic (25), or generally (22).

"Parking in the area is a challenge and removing the use of Ham Street Car Park will simply increase traffic and congestion, noise and add to air pollution on and around the site a residence and others will need to search hard for a parking space."

Member of the public

"...the plans seem to indicate that the whole car park would be enclosed within the construction boundary and hence no parking would be possible. This would seem to be unreasonable, both for Ham House and for the general public and it would seem that the only way in which this option could be accepted is if access to part of the car park was still retained and/or arrangements could be made with the NT to create temporary parking in the grassland to the north of the house."

Thames River Users Group 8

Fifteen consultees were concerned or opposed to the proposal because they believe it would negatively impact the local economy, businesses and jobs.

"Again using a car park which feeds local business is not conducive to maintaining a thriving community."

Member of the public

Overall, there were 42 consultees who provided specific comments about the preferred site option at Ham Street Car Park. This included 20 consultees who raised general concerns about disruption and impacts to the car park in general. The main comment was opposition to the car park being reduced to make way for the intermediate shaft (12). There were also nine comments about the impact of construction, four comments about disruption, four comments that the period of disruption would be lengthy or prolonged, and a single comment about lack of information about what was being proposed.

"Ham Street Car Park and the surrounding areas have high usage throughout the year for dog walking, cycling, parking, watersports in season, and the construction will continue for many, many months."

Member of the public

There were 22 consultees who were concerned about how local communities could be affected by siting the third intermediate shaft at Thames Water's preferred location. Comments received included worry or concern about how recreational and leisure activities could be maintained (12), that local communities would be negatively affected (9), and/or that river users would be affected (6).

"Using Ham Street Car Park will have a negative impact on residents that we park our car there when doing water sports in the river. As it is sometimes not feasible to take the equipment by foot."

Member of the public

Furthermore, 23 consultees were opposed or raised concerns on environmental grounds in relation to the preferred site location. Comments received included that the proposal would damage areas of historical interest and heritage sites including Ham House (12), that flood risk would be increased (8), and that local waterways could be affected (4).

"Ham Street Car Park is directly next to the River Thames and at the heart of Ham Land...these industrial works will destroy this vital habitat, which...should be protected at all costs."

Member of the public

There were 20 consultees who opposed the preferred site option or had concerns about it due to perceived impact of local travel and transport. The main comment was about impact on car parking availability (14), concerns about access (5), impacts of construction traffic (5), and traffic congestion (3).

"Option 1 - it is noted that this parking is used for recreational access in the local area and may also support access to the playing field nearby. We are therefore concerned about the proposed construction area and agree that alternatives for parking in the local area will need to be considered."

Sport England

And there were seven consultees who raised concerns about the impact of the proposal (preferred location) on the local economy and businesses, including the National Trust property, Ham House with the works seen has having the potential to reduce visitor numbers through reduced parking availability.

"The car park is one of few access areas to the river and Ham House...it is also an area for filming....that could be a loss to the economy. Not approved."

Member of the public

"If Intermediate Shaft 3 is constructed on the Option 1 site it would entail the loss of the riverside car park for the duration of the construction activities...it is likely that there would be a significant drop in visitor numbers during the construction works – this would lead to a substantial loss of revenue to the Trust."

The National Trust

Fifteen consultees raised concerns or opposed the alternative location for the third intermediate shaft. This is on land to the south of Ham Street Car Park and west of Ham Street. Comments largely tended to mirror the comments provided in opposition to the preferred site location. There were seven consultees who were concerned about impact on local transport and travel, as well as five consultees who were concerned about impacts on the local community, and four raised concerns about environmental impact.

6.2.4 Intermediate Shaft 4

Thames Water is considering two options for the location of the fourth intermediate shaft. These are:

- **Land to the west of Riverside Drive playground** – the preferred site
- **Land at Riverside Drive and Ham Street** – an alternative site

As with proposals for site options for other intermediate shafts, consultees were again asked for their views on the use of these sites and reasons for their views. In total, 456 consultees provided comments about the siting of the proposed fourth intermediate shaft. This included comments from 450 individuals and six organisations and representative groups. The vast majority of comments received were negative, with 429 consultees raising concerns or opposing the proposal outright. Comments received are summarised in the next section of this report.

Favourable / receptive comments

There were three consultees who provided favourable or receptive comments about the proposal for the siting of the fourth intermediate shaft. There were three comments that both of the site options would be suitable, and single comments that it would not impact wildlife and habitats, residential areas and/or the environment.

Of 30 consultees who made specific comments about the preferred site option, 11 made favourable or receptive comments about this location. There were six comments of general support, three comments that it would be less intrusive or disruptive compared to alternative site locations, and single comments of conditional support on the provision that it would not lead to additional or increased noise or air pollution during construction.

“Option 1 preferred. Again, both options would impose construction traffic on the narrow Ham Street. However, Option 1 to the west of the playground would seem to have a slightly lower impact as the traffic in and out of the construction site would only affect one road at a time.”

Member of the public

There were three consultees who provided favourable or receptive comments about the alternative site location at Riverside Drive and Ham Street. Single comments received were that it was generally supported, or that it was less intrusive than the alternative and/or that local communities would not be affected. There was also a single comment of conditional support on provision that noise and air pollution would not be increased during construction.

“Although there is little difference to both options, we prefer Option 3: Land at Riverside Drive and Ham Street. We acknowledge there are no ecological designations or priority habitats on either site and both sites have a low ecological value; upon completion there should be opportunities to enhance the greenspaces here.”

London Wildlife Trust

Negative comments and concerns raised

Of 429 consultees who provided negative or opposing comments about the proposed locations for intermediate shaft four, 332 consultees made general comments in opposition to the proposal and/or raised concerns. A central comment was that neither of the potential options would be viable or suitable (229). Key concerns also included worry about the impact of construction and disruption (both 47 comments).

"Neither of these are good as they take away open land. Please consider more sophisticated boring equipment that requires fewer access shafts. They didn't drop access shafts down every few hundred meters (sp.) when digging the channel tunnel. This must just be about cost saving."

Representative of St. Margarets Fair

"Absolutely no way, strongly object to both choices!!!! Those places are used and enjoyed by all of us every day! They are not to be a building site! Hope it's clear enough."

Member of the public

There were 216 consultees who were opposed to the proposal and/or raised concerns due to perceived impacts on local communities and residential areas. In addition, there were also 101 comments that local communities would be adversely affected, 70 comments that the proposal would affect local leisure facilities and activities, 54 comments that local schools and schoolchildren would be impacted, 44 comments that children's playgrounds and playparks would be affected, 40 comments that the proposal would have consequences for local residents, and 23 comments that local settlements would be impacted or disrupted.

"Intermediate Shaft 4 - Option 1: Land to the west of Riverside Drive playground and Option 3: Land at Riverside Drive and Ham Street – This open space may be of important value to the local community for recreation and play. It is important that the community is adequately compensated for the loss of any of this space, either through additional provision elsewhere or qualitative improvements to the space that remains. Sport England would be unlikely to be a consultee on development in this location."

Sport England

"Why ruin Ham and all it has to offer especially a playground that the kids in the community use all year round. You need to stay away from Ham and the Thames that is constantly used by people and wildlife."

Member of the public

Other less frequently made comments included a view that the proposal had negative consequences for Riverside Drive (6), concerns about safety (5), and that Riverside Drive play area would be affected (3).

"Riverside drive is a well-used and much loved playground set in a beautiful natural area - we don't want your sewage treatment plans anywhere."

Member of the public

There were 199 consultees who raised concerns about the potential for the proposal to negatively impact the local environment. This included 63 comments that biodiversity, wildlife and habitats would be affected, 48 comments that open or green space would be impacted, 41 comments that the environment in general would be impacted, 38 comments that Ham Lands and Ham Lands Nature Reserve could be negatively affected, and 24 comments that local waterways and rivers could be impacted.

"Land west of Riverside Drive: This site is designated as Metropolitan Open Land. Ham Lands/Ham Lands west of Riverside Drive: This site is Designated as Local Nature Reserve (LNR) and Site of Metropolitan Importance for Nature Conservation (SMINC). There is key ecological interest, specifically: badger colonies, large population of bats with at least 8 of the 11 species recorded in the borough being present, including the two nationally rare species, Leisler's bat and Nathusius' pipistrelle."

The London Borough of Richmond-upon-Thames

Fifty-two consultees were concerned about how the site options proposal for the fourth intermediate shaft could have negative consequences for local transport and travel. There were 24 comments about how traffic and congestion could be increased as a result of construction traffic, 13 comments that traffic congestion would increase generally, 11 comments about accessibility, 11 comments that local roads and local transport infrastructure would be impacted, and nine comments that Ham would be negatively affected by construction traffic.

"Ham is a small, compact village. The streets are narrow. The amount and size of the vehicles needed for this work would be a serious impediment in the area and would cause considerable disruption...Ham is not suitable for this sort of development."

Member of the public

There were also five consultees who were concerned about how the proposal could impact the local economy, businesses and jobs, including tourism by affecting the number of visitors to the local area.

"These locations should be protected from construction at all costs. It is a beautiful area used by thousands of tourists. The scheme is completely unnecessary."

Member of the public

As well as aggregated comments taking into account both locations together, there were also some comments received about each of the potential two locations for the fourth intermediate shaft. There were 20 consultees who were concerned about the impact of construction at the preferred site. Most (17) of those who made comments were worried about negative consequences for local communities. Nine consultees were concerned about environmental consequences, and seven consultees were worried about how local travel and transport would be affected.

There were six consultees who made negative or opposing comments about the alternative site location for the fourth intermediate shaft. Four consultees were opposed because of perceived negative impacts on local transport and travel, while two were concerned about negative consequences for local communities. There were also two of the consultees who raised general concerns about the proposal.

"To the west of Riverside Drive playground would impact the playground, the allotments, the Nursery School, the Richmond and Kew Football Club. More public facilities. The access is questionable perhaps more so with the second alternative site, these are small village roads, not appropriate for HGV's."

Member of the public

6.2.5 Intermediate Shaft 6

Thames Water is considering three options for the location of the sixth intermediate shaft. These are:

- **Ham Lands, west of Riverside Drive** – the preferred site
- **Land at Dukes Avenue** – an alternative site
- **Ham Green** – an alternative site

In total, 518 consultees provided comments about the siting of the proposed sixth intermediate shaft. This included comments from 510 individuals and eight organisations and representative groups. As with comments received on other locations for intermediate shafts, again most comments were negative. There were 483 consultees who raised concerns or who opposed the proposal outright. Comments received are summarised in the next section of this report.

Favourable / receptive comments

Of 39 consultees who provided comments about the preferred site option, 12 provided favourable or receptive comments about it. There were five comments in general support, and five comments about the implementation of the proposed intermediate shaft being less intrusive or disruptive than at other potential sites. There were also a few comments of support on the condition that pedestrian access was maintained, and/or that there would be no impact at the junction at Riverside Drive and Croft Way, and provided there was no impact on residential properties and house values.

"I don't know the area very well but the preferred option at Ham Lands seems to be the least disruptive."

Member of the public

Thirty-five consultees provided comments on the alternative site location at Duke's Avenue. Of those who commented on the potential location for the sixth intermediate site shaft, 15 provided favourable or receptive comments. This included six comments of general support, four comments that it would keep disruption to a minimum, two comments that environmentally protected areas would not be affected, and single comments that local wildlife and also green spaces would not be disrupted or negatively impacted.

There were also a few comments that while having an intermediate shaft would still have implications, it would be better at Duke's Avenue than at the other locations, particularly at the preferred site location.

“Ham Lands is designated and protected as Metropolitan Open Land for its ecological diversity. The construction work would damage the animal and plant life which would last for many years and it would be impossible to mitigate against this. The land at Dukes Avenue would be more suitable but, again, it would impact on the inhabitants Ham Green is another problematic site.”

Member of the public

Negative comments and concerns raised

There were 351 consultees who were opposed in general to the siting of the sixth intermediate shaft. The main comment was that none of the proposed site options were believed to be suitable (263 comments). Other comments included concerns about impact of construction (58), worry about disruption (28), and concern about discharge of sewage (13).

There were 305 consultees who raised concerns or opposed the proposal outright because of environmental concerns. Key concerns raised included a view that biodiversity, wildlife and habitats would be affected (82), that open and green spaces would be impacted (68), that there would be resultant environmental consequences in general (67), that Ham Lands and Ham Lands Nature Reserve would be damaged or disrupted (59), and that Areas of Outstanding Natural Beauty (AONB) or of Special Scientific Interest (SSI) would be impacted (56).

“Ham Lands - a nature reserve, really?...this is totally inappropriate. The damage will be untold...Ham Green - again really - it is a council-managed open space and covered by Public Space Protection Orders and formal byelaws.”

Member of the public

In total, 198 consultees provided negative comments or opposed the proposal due to perceived impacts on local communities. Comments provided included concern about how local people and communities would be affected generally (92), that recreational and leisure activities would be disrupted (60), that people's homes and residential areas would be affected (45), that schools and schoolchildren would be impacted (29), that people's health and wellbeing and quality of life would be affected (20) and that there would be consequences for the village of Ham (19).

There were 44 consultees who were concerned about the impact of the proposal in general to affect local travel and transport. The main concerns in this respect were that the proposal would increase traffic and congestion (19), that there would be consequences as a result of HGVs and other construction traffic (10), that Ham would be negatively impacted by construction traffic (9), and that local transport infrastructure would be negatively impacted too (8).

"I believe all of these locations are unsuitable for construction and work shouldn't be allowed on these green spaces due to the negative impact on wildlife and habitats and as well as the negative impact of construction traffic to the local community for years and years. TW state the project will take 3 years but you have no guarantee for this and we have seen how long major infrastructure projects take in reality."

Member of the public

Eight consultees were concerned about economic impacts, including negative consequences attracting visitors to the local area.

Looking at comments made about each of the three potential site options, negative/opposing comments were received from 29 consultees about the preferred location, 25 consultees were concerned about the location at Duke's Avenue, and 18 consultees raised concerns or opposed the location at Ham Green.

The preferred site location at Ham Lands, west of Riverside Drive

Of those who were negative about the preferred site location generally, there were 12 comments opposing the proposal without explaining further, four comments raising concerns about impacts of construction, two comments about vibration, and one comment about discharge of treated sewage.

Twelve consultees were concerned about how the proposal to implement the intermediate shaft at the preferred location could have negative consequences for local communities. Comments received included how local schools and schoolchildren could be impacted (4), that recreational and leisure activities could be disrupted (4), that local communities would be negatively affected in general (3), and/or that there would be safety issues associated with construction (2).

"Preferred site: again this is very close to a children's day care nursery and will suffer noise, traffic and pollution from the construction site."

Member of the public

Furthermore, 19 consultees were concerned about how the proposal would have environmental repercussions if it were to proceed at the preferred site. Comments received included that conservation and protected areas could be affected (11), as well as biodiversity, wildlife and habitats at Ham Lands Nature Reserve (9), and/or that green spaces at Ham Lands Nature Reserve would be damaged (8).

"We are STRONGLY opposing to the use of Ham Lands, west of Riverside Drive. Or any site located within the Ham area since this is a conservation area, natural habitat to quite a few protected species i.e. bats, badgers and others."

Member of the public

"Shaft 6 - Ham Lands west of Riverside Drive - site is in Ham Lands Nature Reserve and within Ham Lands SINC. There could be a severe effect on local ecology as this grassland and deciduous woodland is home to many birds and animals as well as unique flora and plants."

Richmond & Twickenham Friends of the Earth

There were also a few comments with concerns about impact on local travel and transport and also about socio-economic impacts associated with the proposal to implement the sixth intermediate shaft at the preferred location.

Alternative locations

Duke's Avenue

Looking at concerns raised about the two alternative site locations, there were 16 consultees who made general comments in opposition to the potential site location at Duke's Avenue. This included nine opposing comments without specifying further, four comments about impact of construction, and four comments about disruption. There was also one comment that insufficient information was available on the proposal.

Twenty-two consultees were concerned about the location for the sixth intermediate shaft at Duke's Avenue because of perceived impacts to local communities. There were 13 comments about how it may impact in general, as well as seven comments on how residential areas could be impacted. Other less frequently made comments included concerns about subsidence (2), negative effects on schools and schoolchildren (2), that people's health and quality of life would be impacted (2), and that people's leisure activities and pursuits could be affected (2).

Six consultees were concerned about environmental impact if the sixth intermediate shaft was to be sited at Duke's Avenue. Concerns raised included how green spaces would be damaged (2), and that it could be visually intrusive (2). There were also single comments made about how wildlife could be impacted, and noise pollution as a result of construction.

"The first two proposals are utterly disgusting and I am appalled that they should even be considered. They involve yet more destruction of the unique Ham Lands ecosystem."

Member of the public

Nine consultees made negative comments or raised concerns about local travel and transport if the site location at Duke's Avenue was used. There were six comments about increased traffic and congestion, two comments about accessibility, and single comments that both local transport infrastructure and car parking availability could be impacted.

Ham Green

There were 11 consultees who provided negative comments or opposed the siting of the sixth intermediate shaft at Ham Green without specifying in detail why they were concerned or opposed. This included six comments about general opposition and also six comments about the proposal having the potential to cause disruption.

Fourteen consultees were concerned about how the proposal could affect local communities. There were seven comments that local people in general would be affected, four comments that people's recreational and leisure activities would be impacted or disrupted, two comments that local schools and schoolchildren would be affected, and two comments that residential areas would be affected.

"...Ham Green is also a bad choice given the significant impact on leisure activities in what is a well-used green space..."

Member of the public

Travel and transport were a concern for eight consultees. Comments raised included five comments that traffic congestion would be increased in general, two comments that Grey Court School would be impacted, and single comments about how Ham Street could be affected, and that there would be safety issues associated with construction vehicles. The London Borough Richmond-upon-Thames was concerned about how the local residents of Ham Green village could be disrupted, as well as stating that the area was of ecological interest.

"Designated as a Village Green and Metropolitan Open Land, with Key ecological interest and stag beetles recorded on site. The site is currently involved in the Ham Close development, which has been a contentious matter with residents. Further disruption on site will result in increased temporary loss of amenity and green space."

The London Borough of Richmond-upon-Thames

7 Recycled Water Discharge and River Water Abstraction Sites

7.1 Overview

This part of the Project involves the building of intake and outfall structures upstream of Teddington Weir, so that water could be taken from the River Thames and be replaced by recycled water. The consultation material stated the following:

Intake structure: the new intake structure would be built upstream of Teddington Weir. It is likely to be around 15m long and up to 4m high (above the level of the river), and consist of a platform extending around 3m into the river, with fish screens, pipes and pumps. To build it, a temporary cofferdam (an enclosure built within a body of water to allow the enclosed area to be pumped out or drained) would be extended from the riverbank into the river to create a dry worksite. It's expected that construction of the intake and outfall structures would take around 21 months.

Outfall structure: the outfall structure would be smaller than the intake structure, built into the riverbank at the same level as the river. A temporary cofferdam would also be needed to build the outfall point. Once built, the surrounding land would be reinstated and diverted footpaths on the riverbank reopened. Plans for the project do not allow for the discharge of storm overflow during periods of heavy rainfall or untreated wastewater or sewage into the River Thames. The design will allow for only recycled water treated in the tertiary treatment facility to pass through the new pipe, and then be discharged into the River Thames via the outfall structure upstream of Teddington Weir.

Consultees were asked if there was anything Thames Water should take into account in selecting the sites for discharge and abstraction. The next section of the report provides a summary of the feedback that was received.

7.2 Summary of feedback received

Comments were received from 624 consultees. This included 614 individuals and 10 organisations and representative groups. Overall, seven consultees provided favourable or receptive comments while the majority (544 consultees) raised concerns or were opposed to locating the discharge and abstraction sites in the preferred area. In addition, 170 consultees provided suggestions.

Table 7.1 includes the number of consultees who made comments, with those making negative comments or raising concerns broken down further by key theme.

Table 7.1: Number of consultees who made comments broken down by category / theme

Category / theme	Number of consultees providing comments
Favourable comments (overall)	7
Negative comments and concerns raised (overall)	544
<i>General negative comments and concerns</i>	<i>348</i>
<i>Environmental impacts</i>	<i>381</i>
<i>Concerns about how local communities might be affected / impacted</i>	<i>283</i>
<i>Traffic and travel issues</i>	<i>23</i>
<i>Socio-economic impacts</i>	<i>10</i>
Suggestions	170

7.2.1 Favourable / receptive comments

Of the seven consultees who provided favourable or receptive comments, most comments made were supportive provided certain conditions would be met. There were four comments in support of the proposal provided water quality would be maintained, and two comments provided that the new structures would not be visually intrusive. There were also single comments in support of the proposal provided that the part of the river in the vicinity of the proposed structures remained navigable, that water temperature would not be changed, and provided the discharge site would allow treated water to properly mix at low tide.

"So long as (1) river water quality is maintained or improved from current standards, (2) the river either side of the weir remains navigable and (3) the discharge and abstraction 'structure' and systems are sympathetic to the current visual 'amenity' and general environment, then I have no objections."

Member of the public

7.2.2 Negative comments and concerns raised

Most consultees who provided comments raised concerns or were opposed to the proposal. There were 348 consultees who were generally opposed to the proposal. The main comments received in this regard were concerns about treated sewage being released into the River Thames (146 comments), and general

comments opposing the proposed plans (145 comments). Other less frequently made comments included concerns about impacts of construction (38), a belief that the proposal was flawed or badly thought out (35), that it would be disruptive (20), and concern about discharge of treated sewage at Teddington (14).

"Fully against it as based on my current experience, I expect even more sewage to be released into this part of the river."

Member of the public

Some 283 consultees raised concerns or were opposed to the proposal on the grounds of perceived impacts to local communities. The main comments were that the proposal would have consequences for people's recreational activities and leisure pursuits (157), that river users would be affected (103), and that local communities in general would be impacted (76). Other, less frequently made comments revolved around concerns on people's health, quality of life and wellbeing (53), and that local schools and schoolchildren would be affected (47).

There were 381 consultees who had environmental concerns or who were opposed because of perceived impact to the local environment. The main comments received included concerns about how biodiversity, wildlife and habitats would be harmed (150), worry about deterioration of water quality (90), that waterways would be affected (85), environmental impacts in general (84), and of visual intrusion and reduced visual aesthetics (33).

"The area upstream of Teddington is an area of natural beauty and established eco systems. The habitats and animals relying on this area for existence would all be affected detrimentally by these proposals as would the countless numbers of people who use the waterways."

Member of the public

Twenty-three consultees were concerned about how the proposal could affect local transport and travel. Comments included concern about increased traffic congestion as a result of construction vehicles (17), that local transport infrastructure would be impacted during the construction phase (8), that accessibility is difficult in the area where the proposed structures would be built and operate (5), and concern about reduced car parking availability (2).

There were also ten consultees who raised concerns about how the proposal could impact the local economy, jobs and tourism.

"Of course there are reasons why you should not situate the river abstraction facilities upstream of Teddington Weir! There is not one person in the whole area that would support this location...please take into account the rural/suburban beauty of the area, the wildlife, the tourism, and local life, and do not put these facilities in the Teddington area of the River."

Member of the public

7.2.3 Suggestions

There were 170 consultees who made suggestions and offered considerations for Thames Water to take into account.

Ninety-three consultees made suggestions relating to the environment. Key comments made in this regard included that biodiversity, wildlife and habitats should be considered (34), that water quality should be taken into consideration (28), that the local environment in general should be taken into account (21), that waterways and rivers should have more consideration (15), and nine comments that visual aesthetics should be taken into account with the proposed structures hidden from sight.

"Abstraction needs to minimise the fatality of fish...as best possible, and provide contingencies in case of emergencies to prevent mass deaths, given that the proposed end of the pipe is at Lockwood Pumping Station in the Lee Valley."

London Wildlife Trust

Eighty-seven consultees cited that the local community should be taken into account. The main considerations included that local people and local communities should be considered (33), to consider further people who take part in recreational activities in the vicinity of the proposed construction site (24), that local people in general should be taken into account (20), that Thames Water should listen to local communities (15), and that people's quality of life, health and wellbeing should be considered (13).

Eleven consultees made suggestions in relation to local transport and travel. There were six comments about the impact of HGV and construction traffic, two comments about access for construction traffic, and four comments about consideration should be given in terms of impact on cycle paths. Three consultees provided comments in relation to consideration of the local economy.

There were also 50 consultees who made other comments about what should be taken into consideration. This included 15 comments about consideration of slow water flow in the area where the proposed structures would operate, 14 comments about impacts of construction, and 11 comments about lack of public trust in Thames Water.

"Your emerging proposals should take into account the mistrust you have caused by polluting. People don't trust Thames Water. It's a tough crowd when nobody trusts you."

Member of the public

Some consultees asked questions, including from Maidenhead to Teddington Catchment Partnership:

“What are the considerations for ongoing maintenance and access? What are the considerations for the visual impacts, disturbance to habitats/wildlife corridors and restricting public access?...will the new tertiary treatment mean that the overall sewage at Mogden is treated to a higher standard, and a better standard effluent is discharged at Teddington?”

Maidenhead to Teddington Catchment Partnership

8 Connection to the Thames Lee Tunnel Raw Water Main

8.1 Overview

For the connection pipeline to the Thames Lee Tunnel, a further shaft site would be required to facilitate a connection between the new pipeline and the existing raw water main. Two options are being considered for this: either land at Northweald Lane or at Tudor Drive. Consultees were asked to give their views on use of these two sites and the reasons for such views.

8.2 Summary of feedback received

There were 325 consultees who provided comments about the proposal to locate the connection pipeline to the Thames Lee Tunnel at Northweald Lane or Tudor Drive. Comments were received from 319 individuals and six organisations and representative groups. Overall, four consultees provided favourable or receptive comments about the Northweald Lane location, 10 consultees provided favourable or receptive comments about the Tudor Drive location and 290 consultees provided negative comments or raised concerns about the connection pipeline to the Thames Lee Tunnel. Table 8.1 includes the number of consultees who made comments, with those making negative comments or raising concerns broken down further by key theme.

Table 8.1: Number of consultees who made comments broken down by category / theme

Category / theme	Number of consultees providing comments
Favourable or receptive comments about Northweald Lane	4
Favourable or receptive comments about Tudor Drive	10
Negative comments and concerns raised (overall)	290
<i>General negative comments and concerns</i>	246
<i>Concerns about how local communities might be affected / impacted</i>	115
<i>Environmental impacts</i>	87
<i>Traffic and transport</i>	44
<i>Socio-economic impacts</i>	2

The next sections of this chapter examine the reasons put forward in support of, or opposition to the proposal to locate the connection pipeline to the Thames Lee Tunnel at Northweald Lane or Tudor Drive.

8.2.1 Favourable / receptive comments

Of the four consultees who provided favourable or receptive comments about the **Northweald Lane** location, this included general supportive comments (1), support for this proposal because it could minimise disruption (2), and that it would have lesser impact on local people (1).

“Northweald lane site should have a smaller impact on residents and local traffic.”

Member of the public

Others who provided comments indicated that they would be in support of the proposal (or would not object to it) provided certain conditions would be met. This included that they would support the proposal provided it would not result in disruption in Richmond (1), that facilities on the main site on the Burnell Play Area are protected (1), the work needed to facilitate access through the trees is limited to pruning and surgery rather than removal (1), and there is restoration of biodiversity and amenity facilities (e.g. paths) that are affected by the works (1).

“If construction of the shaft is contemporaneous with the abstraction/outfall facility, presumably the shaft construction site could be smaller, purely protecting the works with all other facilities contained on the main site on the Burnell Play Area.”

Member of the public

Of the 10 consultees who provided favourable or receptive comments about the **Tudor Drive** location, this included general supportive comments (6), support for this proposal because it will have lesser impact on biodiversity and wildlife (3), that it will have lesser impact on local people (2), that it will have lesser impact on trees and woodland (2), that it will provide easy access for vehicles (1).

“I think the land at Tudor Drive should be used as it would be less disruptive to wildlife and all the mature trees there.”

Member of the public

“Land at Tudor Drive, as this would cause far less ecological damage compared to Option 1, which would result in an acknowledged loss of habitat from the Royal Park Gate Open Space SINC, as well as potential impacts on protected and/or priority species as well as a number of trees subject to TPO (all which would require prior assessment and appropriate mitigations).”

The London Wildlife Trust

Others who provided comments indicated that they would be in support of the proposal (or would not object to it) provided certain conditions would be met. This included that they would support the proposal provided it would not result in disruption in Richmond (1).

8.2.2 Negative comments and concerns raised

There were 290 consultees who provided negative comments and/or raised concerns. This included 246 consultees who made general negative comments, 115 who were worried about how local communities could be affected, 87 who were concerned about negative environmental impacts, 44 who were concerned about impacts to local traffic and travel as a result of construction, and two who were concerned about negative socio-economic impacts.

There were 178 consultees who believed that neither site option would be suitable. Other comments referred to disruption (30), the potential impacts of construction (26), concern that the proposal could result in sewage (either treated or untreated) into local waterways and watercourses (20) or feeling that the proposals were not necessary (10) or lacked detail (9) or had not been properly thought through (6).

"Northweald Lane is a small urban park used by families with a playground in it. Tudor drive is highly residential. Neither are suitable. I fundamentally object to the premise of the scheme and object to the use of either site."

Member of the public

Other less frequently cited general concerns included that the proposal was too expensive (3) or that there is a lack of space (1).

Community impacts

There were 115 consultees who were concerned about how the proposal could affect local communities. The main comments received included general concerns about impacts on local communities (51), that residential areas would be impacted (37), that recreational or leisure activities could be affected (18), or concerns about people's local health and wellbeing (12).

"We live in Northweald Lane and this would cause significant disruption for us."

Member of the public

"As I live near Tudor Drive I want no construction of any kind near there."

Member of the public

Other, less frequently cited comments about how local communities and local people could be affected by the proposal included named specific local areas including Ham and Kingston.

"The thought of using anywhere in North Kingston is terrifying. It is a very quiet area and the two or more years of construction will cause unimaginable noise and disruption."

Member of the public

Environmental impacts

There were 87 consultees who were concerned about the potential for the proposal to harm or negatively impact the local environment. The main comments received included worry that biodiversity, wildlife and habitats could be negatively affected (35), concern about noise pollution during construction (15), perceived impacts on green spaces (17), and/or water quality (10).

"This project has not been effectively shown to adequately consider local residents, the quality of the river water, or the ecology of the land it will be built on. While Thames Water has made some efforts to improve the project and belay residents' concerns, the scheme is fundamentally flawed, and no amendments, beyond a wholesale return to the concept stage, will make it acceptable."

Member of the public

Other less frequently made concerns included that the proposal could impact visual aesthetics (8), and/or air pollution (8), and that protected areas including AONBs and ancient woodlands could be affected (6), worry or concern about local waterways (5), that trees and woodland could be impacted (4).

Traffic and transport

There were 44 consultees who raised concerns about local travel and transport as a consequence of the connection pipeline to the Thames Lee Tunnel. Concerns were raised about how the proposal could result in increased traffic and traffic congestion, including, that traffic and congestion could be increased in general (23), the impact of construction traffic and HGVs (17), and that local roads could be impacted (12).

"The land in Tudor Drive is close to a busy crossroads. I am concerned about potential disruption to traffic especially as there will already be extra lorry movements. There are only three access roads into Ham. Northweald Lane is a residential road unsuitable for heavy lorries."

Member of the public

Socio-economic impacts

There were two consultees who were concerned that the proposal could negatively impact local businesses. This included comments about how local businesses could be affected, and two comments about how visitors could be dissuaded from visiting the local area, with negative economic consequences.

9 The process undertaken to identify site options

9.1 Overview of the proposal

The site options consultation document¹⁰ summarises the site options that were subjected to detailed appraisal, the results of that work and current thinking regarding preferred sites at this early stage in the development of the Project.

A number of key principles have informed the number of sites appraised and their location. Overall, Thames Water appraised 23 sites to locate different above ground features of the Project. Further details, including a written explanation of the appraisal process and its outcomes, including reasons for removing some options are contained within the site appraisal report for the Project, 'Teddington DRA site appraisal report'¹¹. A 'map-book'¹² showing the location of all of the sites appraised was also made available.

Consultees were asked for their views and any information they could provide as part of ongoing consideration of the site options that have been identified.

9.2 Summary of feedback received

Comments were received from 902 consultees. This included 868 individuals and 34 organisations and representative groups. A small number of those who made comments made favourable comments about the process undertaken to identify site options.

"The options seem to have been carefully selected and assessed. However, you say that you are still to contact some potentially key landowners about the proposals and wonder whether they should have been within the first stage of consultation, e.g. National Trust, in case their input meant that some of the options were not possible."

Thames River User Group 8

However, most comments received were negative or critical of the process undertaken to identify site options. A chief criticism revolved around a lack of alternative site options or locations that should have been made available for consultees to comment on (355 comments).

"It is not clear how you identified site options. All of the options you provide are essentially next to each other meaning there isn't really a choice."

Member of the public

Other frequently made comments included a belief that an environmental impact assessment should have taken place (260), that there had been a lack of consultation with local communities (239), a lack of assessment in terms of likely social impact or social value (199), that local communities had not been

¹⁰ [TDRA+Consultation+Report+V0.pdf \(dn9cxogfaqr3n.cloudfront.net\)](#)

¹¹ [Microsoft Word - LWR Sites Appraisal Report Teddington \(dn9cxogfaqr3n.cloudfront.net\)](#)

¹² [TDRA+Consultation+Mapbook+V0.pdf \(dn9cxogfaqr3n.cloudfront.net\)](#)

considered (193), that there was insufficient information (173), that the process was flawed or badly thought out (149), a belief that there has been a lack of transparency (135), and/or that the process was biased and unreliable (124).

"We refer to our comments made regarding intermediate shaft 2. The Friends of Moormead Park asks that Thames Water publishes all of its research/analysis undertaken so far to identify the two site options on Moormead Park. We have significant concerns that this work was extremely 'high level' and completely failed to recognise the potential impact TDRA will have on the local community."

The Friends of Moormead Park

Less frequently made comments included a belief that there had not been a cost-benefit analysis (43), a lack of an independent expert's view (26), lack of consultation with local businesses (19), that detailed timelines had been lacking (10), and lack of an archaeological assessment (8).

10 Other comments and feedback received

10.1 Overall comments about the Project

Most of those who participated in the consultation provided comments on the overall Project. Comments were received from 2,154 consultees. This included 2,116 individuals and 38 organisations and representative groups. Overall, 24 consultees provided favourable or receptive comments while the majority (2,116 consultees) raised concerns or were opposed to the Project. In addition, 1,156 consultees made suggestions and noted considerations which they wanted Thames Water to take into account. Comments provided are briefly summarised in the next sections of this report.

Table 10.1 includes the number of consultees who made comments, with those making negative comments or raising concerns broken down further by key theme.

Table 10.1: Number of consultees who made comments broken down by category / theme

Category / theme	Number of consultees providing comments
Favourable comments (overall)	24
Negative comments and concerns raised (overall)	2,116
<i>General opposition to the proposal</i>	2,042
<i>Environmental impacts</i>	1,522
<i>Concerns about how local communities might be affected / impacted</i>	1,244
<i>Traffic and travel issues</i>	255
<i>Socio-economic impacts</i>	92
Suggestions	1,156

10.1.1 Favourable / receptive comments

Of those who provided favourable or receptive comments about the Project, it was generally believed that the TDRA was necessary (8), and that it would help prepare London for drought in future (4). There were also some comments of conditional support, including that it would be supported provided water quality was maintained (10), and that biodiversity, wildlife and habitats would not be negatively affected

(3). There were also single comments of support provided local facilities / amenities, and also open and green spaces would not be impacted.

"I'm writing to you to express my support for the overall project. Overall, it is absolutely clear that here in the Thames Valley there is a need to make more efficient recycling of our water...the concerns being expressed for the creation of the shafts to be sunk into various locations are unfounded on the basis that they will be a temporary effect upon those areas, and that in the long-term the benefits of the recycled water will be significant to us all."

Member of the public

10.1.2 Negative comments and concerns

There were 2,042 consultees who provided negative comments about the Project, and/or raised concerns. Comments received included general opposition (1,654), concern about discharge of sewage into local rivers and watercourses (694), concerns about the track record of Thames Water (667), that the process was flawed or badly thought out (560), worry about impact of construction (433), and that Thames Water were prioritising profit and shareholders over the needs of local people (404).

"...I am aghast at the pure effrontery of Thames Water to even consider the project and its subsequent proposals..."

Member of the public

"Overall, this is a poor plan that has minimal benefit for our water supply, will cause huge disruption in the local community and is likely to have a long-term detrimental impact on the water quality of the Thames."

River Thames Boat Project

"It is my view, and the view of my constituents, that the project should be rejected in its entirety, and I would urge Thames Water to consider an alternative plan to secure London's water supply for future decades."

Sarah Olney, MP for Richmond Park

"We are opposed to the whole scheme not just certain aspects of it."

Richmond and Kew Football Club & Kew & Ham Sports Association

Environmental concerns

Some 1,522 consultees were concerned about the impact of the Project on the local environment. Such concerns included perceived negative consequences for the environment (868), impacts on biodiversity, wildlife and habitats (784), concern about negative consequences for local rivers and watercourses (490), worry about how water quality could be affected (398), that open and green spaces would be damaged (323), concern about the release of chemicals into the River Thames (230), and concern about how protected areas and woodlands could be negatively affected (222).

"Your proposal is completely unacceptable. You should take into account other options which are less damaging to the environment and the millions of users of the Thames and its surroundings."

Member of the public

"My constituents are extremely worried about the environmental impact of these proposals, including on water quality, human health, biodiversity and wildlife."

Munira Wilson, MP for Twickenham

"...I am writing to voice our strong objection to Thames Water's proposed water abstraction scheme at Teddington Lock. This stretch of water is already seriously polluted...."

Leander Sea Scouts

"No standards for water quality testing and coverage in relation to this scheme have been published except that Thames Water has confirmed they do not propose to screen out PFAS and PFOS. They are planning to conduct a live experiment on the Thames."

Save Our Lands And River (SOLAR)

Other, less frequently cited environmental concerns included worry about noise pollution (120 comments), negative impacts to air quality, dust and pollution (114), negative impacts on green spaces including the Thames Path (106), visual impacts (90), and negative impacts on water temperature (75).

"I am particularly alarmed by the potential impact on the local environment and ecology, as well as the adverse effects it may have on those who use the Thames Path. The Thames Path is not only a cherished recreational space for the local community but also serves as a vital habitat for various flora and fauna."

Member of the public

Community impacts

There were 1,244 consultees who provided negative comments or raised concerns about how the Project could impact on local communities. Many of the comments provided tended to mirror comments made about specific aspects of the Project. The main comments included concern about how local communities would be affected (667), that people's recreational and leisure activities and pursuits could be disrupted (397), that there would be consequences for people's quality of life, health and wellbeing (338), that people who use the River Thames would be affected (264), that local schools and schoolchildren would also be affected (227), and that people's homes and residential areas would be affected too (211). There were also concerns raised regarding safety issues (148), and that pedestrian access could be affected (128).

"The DRA is not right for the river, not the right plan for London and not the right plan for the people who live by the river and the surrounding area or use/visit the river and the surrounding area."

Member of the public

"In addition to the biodiversity value, there is also of course the Amenity value of these sites to consider. Each of the sites provide much treasured open space for our residents and visitors alike. I am sure you will feel this reflected at your community information events as your proposal is likely to have a negative impact on users."

London Borough of Richmond-upon-Thames

Traffic and travel issues

There were 255 consultees who raised concerns or were opposed to the Project because of perceived impacts to local traffic and transport. The chief comments made were centred on impacts of HGV and other construction traffic (96), that local roads and transport infrastructure would be negatively impacted (73), that traffic congestion would increase (72), that construction traffic around/near Ham would be particularly problematic (50), and that there could be safety issues (26).

"I am particularly concerned at the impact heavy construction traffic will have as it leaves the proposed site at Moormead Park. The traffic will have to exit the site via Hill View Road and go on a Victorian-era bridge. If the traffic then joins the A316 it will simply add further congestion to what is already a heavily congested roundabout."

Member of the public

Socio-economic impact

There were 92 consultees who provided negative comments or raised concerns about economics including that visitors and tourists could be discouraged from visiting the local area (44), and that the Project was not financially sound nor sensible.

"I strongly object to this proposal. I do not believe this project is environmentally or economically sound...construction would impact local residents' amenity."

Member of the public

"This email is confirmation of the objection for the Thames Water's TDRA scheme. There are countless economic, environmental and social reasons that the scheme should not go ahead."

A local business

10.1.3 Suggestions

In total, 1,156 consultees made suggestions about plans to implement the Project. There were 591 comments about fixing leaks and faults rather than implementing the Project in the first place. It was believed that by repairing faults and fixing leaks this could save enough water to mean that an extraction facility would not be needed. Other frequently made comments included for Thames Water to find another solution without specifying further (282), to find a greener or more environmentally friendly solution (279), to upgrade existing infrastructure (206), to encourage and educate the general public on water usage (103), to find a solution that would be less impactful on local communities (102), and to reuse water systems at Beckton or Mogden Lane plants instead (88).

"Wholly unnecessary - deal with the leaks instead. This is simply a symptom of failure and a desire to spend on large infrastructure facilities rather than working for a better water system."

Member of the public

"It is important to stress that the BWA, as an impacted community and Thames Waters' 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."

Broom Water Association

Other, less frequently made suggestions included build more reservoirs (60), renegotiate or cancel current water transfer schemes such as the East Suffolk Transfer Agreement (60), install water meters (38), for Thames Water to look at alternative locations for water abstraction such as at Queen Mary reservoir (20), and to invest in sustainable development (18).

"The Queen Mary Reservoir - water from this reservoir which is the equivalent of 15mlpd could be made available for extraction. Why is this not considered?"

Member of the public

Furthermore, some of those who provided feedback said that they refuted a claim by Thames Water that the Project represented "Best Value", and suggested more detail was needed.

"There has been no clear explanation about why this is the 'Best Value' option. I understand that the opposition to the TDRA was extensive yet very few of the concerns raised have been addressed...we need to understand why this represents 'best value' and why other options are now not being considered."

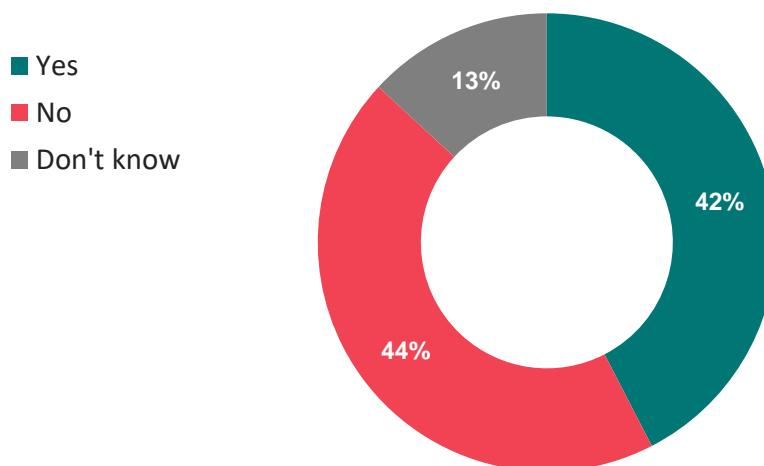
Member of the public

10.2 Comments received about the consultation

Those who completed a paper or online response form were asked if the consultation materials were easy to understand. Of the 921 consultees who answered the question, opinion was divided with 42% saying 'yes' and 44% saying 'no'. Around one in eight (13%) did not know

Figure 10.1: The consultation materials

Q13. Were the consultation materials clear and easy to understand?



Base: All who completed a response form and answered the question (921 consultees)
Consultation period: 17 October to 11 December 2023

Those who completed a response form were also asked about how Thames Water could keep them informed about the Project. Just under three-fifths (58%) said newsletter, and approaching half (47%) said through face-to-face events. One in four (25%) also suggested other ways, and just under one-fifth (18%) did not select any of the response options.

Of those who suggested other forms of communication, this included via email, social media, online webinars, keeping a website updated, and posting information to homes within a set radius of the affected areas, and/or for Thames Water to collaborate with other organisations, including local councils and elected representatives.

"I believe that Thames Water should work closely with the councils and local MPs and find a suitable way to communicate what is happening that is not just one sides view."

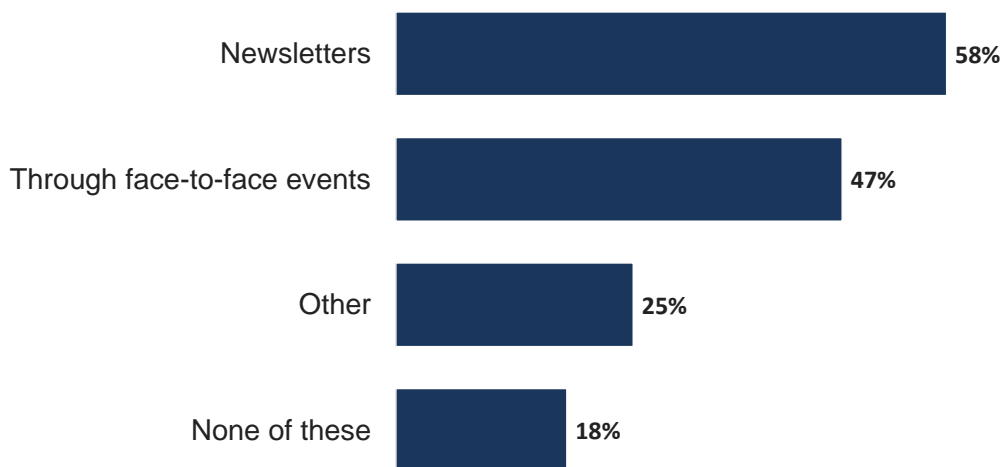
Member of the public

"Post to ALL residences within a 5-mile radius. You should also make the plans known to residents downstream of the proposal, whose river will be polluted."

Member of the public

Figure 10.2: Keeping consultees informed

Q14. We are keen to keep you informed about the project. How do you want us to communicate with you?



Base: All who completed a response form and answered the question (916 consultees)
Consultation period: 17 October to 11 December 2023

Not everyone who selected the other response option on the response form suggested other forms of communications. It was clear that some consultees were opposed to the Project in its entirety and repeated comments they had already made about not wishing for the Project to proceed.

"No reason to communicate if you stop dumping raw sewage into our rivers."

Member of the public

"Just cancel the project."

Member of the public

Of those who provided comments to open or free-text questions, as well as via email and letters in the post, some consultees made comments about the consultation itself. There were six favourable comments and 430 negative comments made about the consultation.

Of favourable comments received this included a view that Thames Water had listened to previous feedback and had provided important detail on particular aspects of the Project, including locations of intermediate shafts, and that the brochure providing details about what was being proposed was well written, with staff at events being helpful and knowledgeable.

"It is good to see that Thames Water has listened to feedback from previous consultations and were able to provide some critical details on the scheme relating to possible shaft placements."

Member of the public

"The brochures are well written and understandable. The staff and consultants at the two engagement events I attended were knowledgeable, professional and helpful."

Member of the public

However, the vast majority of comments received about the consultation were negative or critical. It was clear that many of those who were providing comments were opposed to some or all aspects of the Project, and as such were critical of being consulted in the first place.

"You are handling the consultation process poorly by asking people detailed questions about a scheme where there is fundamental opposition against it."

Member of the public

"The consultation feels unduly complicated, and the public are being asked to provide objective feedback without Thames Water providing meaningful information relating to the impact on our daily lives. Residents are being urged to choose preferred locations rather than be able to object to them outright."

Moormead Cricket Club

"Despite much of the pipework and harm being caused in Ham, no consultation was held in Ham and the Ham and Petersham Neighbourhood Forum, a statutory consultee, was not consulted. At the consultations that did happen, there seemed little awareness of the impact on Ham that the project will have. Please stop this project immediately."

Ham and Petersham Neighbourhood Forum

10.3 Equality monitoring

The Equality Act 2010 protects people against discrimination based on nine protected characteristics. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Consultees were asked to explain if they believed the proposals would discriminate against people with protected characteristics. There were 177 consultees who provided comments about this. This included comments from 174 members of the public and three organisations and representative groups.

The main comments received were that the proposals would discriminate against children and young people (48), disabled people (33), elderly people (31), everyone (26), users of open and green spaces (18), people with mental health conditions (18), and local communities in general (15).

Of those who believed the proposals would discriminate against **children and young people**, many of the comments were about how the Project would (if it proceeded) take up outdoor space and negatively impact areas where children and young people play. Examples of areas cited included Moormead Park, Ham Lands and Radnor Gardens.

"I think your proposals will discriminate against young children who NEED to use the open space and sport/play facilities of Moormead Park all year round. Some have nowhere else to run around."

Member of the public

"...open space to use in Radnor Gardens as any flooding will result in disease on the fields/walkways/benches. No children can play there with their animals - some disabled. Children's playpark would be impacted by this."

Member of the public

Those who believed **disabled people** would be disadvantaged and/or discriminated against, comments' were similar to those who provided comment about how children and young people could be affected. Concerns were raised about how the Project would have negative consequences for disabled people by taking away or impacting negatively on open and green spaces, and associated negative impacts of construction.

"How will those suffering from disabilities be able to cope with the noise, and air and sound pollution from the works?."

Member of the public

Some of those who believed that **elderly people** would be discriminated against believed this was because such people would be less likely to have access to technology and the internet. It was thought elderly people have had a reduced opportunity to take part in the consultation to provide their views and opinions.

Other, less frequently made comments included a view that the TDRA would discriminate river users (13), people on low incomes (10), people who are neurodiverse (10), mothers (7), pregnant people (7), those without internet access (4), and women (3).

"People with neurodiversity who live in the area, for example autistic people, will be discriminated against by such clear and obvious damage to the natural environment and the disruption to their routines and regular activities."

Member of the public

10.4 Other comments and feedback received

Some of those who took part in the consultation provided other comments and/or provided additional information. This included asking a question of Thames Water, or requesting additional information. There were also some consultees who provided links to other reports, documents and articles. These were passed to Thames Water for its review along with all responses received to the consultation. A small number of those who provided comments were critical of government or suggested that there had not been enough detailed information for them to adequately comment on the proposals.

11 Late responses

11.1 Summary of feedback received

A total of 29 responses were submitted via email after the consultation closing date. These have not been included in the main analysis contained in this report. A brief summary of the key points raised are included below.

Consultees expressed various concerns about the TDRA:

- Doubts were raised about Thames Water's ability to deliver and operate infrastructure effectively, citing past delivery issues and unaddressed problems, including leaks.
- It was feared that the TDRA would negatively impact recreational river activities seen as crucial for people's mental health and wellbeing.
- Environmental concerns were also prominent, with fears of irreversible harm to protected areas and disruption to the river's ecosystem, which may potentially affect human health. It was also noted that the flood risk had not been assessed.
- Concern was also expressed that cumulative environmental issues might lead to a decrease in property values.
- It was believed there are more environmentally friendly and cost-effective alternatives.

Appendices

Appendix A – List of organisations that responded to the consultation

The following is a list of organisations that responded to the consultation within the advertised consultation period. In total, 42 organisations provided a response to the consultation.

There were three organisations and representative groups that requested confidentiality – these organisations have not been included in the list of organisations, nor have they been quoted or mentioned anywhere in this report.

List of stakeholder organisations and representative groups

- Broom Water Association
- Cllr Alexander Ehmann, St. Margarets and North Twickenham
- Cllr Andree Frieze, Ham, Petersham & Richmond riverside
- Cllr Ben Khosa, St Margarets and North Twickenham
- Cllr Julia Neden-Watts, London Borough of Richmond-upon-Thames
- Cllr Katie Mansfield, St Margarets and North Twickenham
- Coal Pension Properties Ltd, their legal representative Hogan Lovells, and also Delancy
- Friends of Moormead Park
- Friends of the River Crane Environment
- Grey Court School
- Habitats & Heritage
- Ham and Petersham Association and Amenities Group
- Historic England
- Leander Sea Scouts
- London Borough of Hounslow
- London Borough of Richmond-upon-Thames
- London Wildlife Trust
- Lord Goldsmith of Richmond Park
- Maidenhead to Teddington Catchment Partnership
- Middlesex County Cricket Club / Middlesex Cricket Board
- Moor Mead Football Club
- Moormead Cricket Club
- Munira Wilson, MP for Twickenham
- National Trust
- Petersham and Ham Sea Scouts
- Richmond & Twickenham Friends of the Earth
- Richmond and Kew Football Club & Kew & Ham Sports Association
- River Thames Boat Project
- Royal Borough of Kingston-upon-Thames
- Sarah Olney, MP for Richmond Park
- Save Our Lands and Rivers (SOLAR)
- Sport England
- St. Margarets Fair
- St. Richards Church of England Primary School
- St. Stephen's Primary School

Teddington Direct River Abstraction Site Options Consultation – Feedback Report

- Teddington Bluetits
- Thames River Users Group 8
- William Curley Pâtissier Chocolatier

Appendix B – Stakeholder summaries

This section provides further detail of key comments provided about the proposals from organisations and representative groups.

Location for the proposed tertiary treatment facility and start of the pipeline at Mogden Sewage Treatment Works

Environment and heritage groups	
Friends of the River Crane Environment (FORCE)	FORCE was concerned that the proposal would occupy substantial space within the Mogden works, which it stated should have been used for the site's core function of sewage storage and treatment. FORCE was concerned that the proposal could negatively impact the facility's capacity to manage existing sewage flows and accommodate future growth. It was thought that the proposed works could increase the frequency and volume of storm sewage discharges into the tidal Thames and the tidal Crane, potentially affecting the effectiveness of Crane catchment-based storm water management solutions.
Richmond and Twickenham Friends of the Earth	It was noted that the Mogden site was a Site of Importance for Nature Conservation. Concerns were raised that the proposal could lead to the removal of deciduous woodland, a priority habitat, and a loss of local open space during construction. Concerns were also raised about potential air quality, noise, and vibration impacts on local residents during the construction phase, and it was questioned whether the operation of the completed facility could also affect local residents.
Thames River User Group 8	It was stated that the river flow rates at the Kingston gauge would suggest that even during dry spells, the flow rate has rarely been so low that extracting 75 million litres per day would reduce it to less than 300 million litres per day, or a flow rate of 4.3 cubic metres per second. As such it believed that most of the time, water could be taken without needing to be replaced with treated water to maintain the required flow. However, it stated further that if the Lea Valley reservoirs did not have enough storage to compensate for the few days when extraction without replacement would reduce the flow rate below 300ml/d, then it might be sensible to provide recycled water from a nearby treatment facility with sufficient capacity and pipeline access, at Mogden. It was suggested that it would be beneficial to position the facilities and the start of the pipe to minimise the pipe length, to take care to minimise tree loss, and to replace any lost trees with new plantings in suitable locations within the site.
Elected representatives	
Sarah Olney, MP for Richmond Park	Sarah Olney said Thames Water had repeatedly stated that space restrictions at Mogden would limit the level of water treatment possible at the site. She believed that should higher levels of

	treatment become necessary as population density increases and water quality declines, that this could put the future utility of the project into question.
Local government organisations	
London Borough of Hounslow	The London Borough of Hounslow was concerned that the release of treated sewage water into the River Thames could impact the local environment, as well as there being disruption to the local area as a result of construction. The council said it undertook its own polling of local residents who had told it that they did not feel they had been given sufficient reassurances that replacing the Thames River water with recycled water from Mogden would be safe and suitable for the range of flora, fauna and the biodiversity of the Thames water. The council also stated that its residents were concerned about the proposal to replace abstracted water with recycled water which would require a lower level of purification and would be environmentally damaging.
Other organisations	
A representative of behalf of St. Margarets Fair	The representative of St. Margarets Fair stated that they have yet to see any alternatives to using Mogden STW, and that they could not envisage how the site at Mogden was going to generate more outfall water.

Shaft Site Options

Intermediate Shaft 1	
Delancy	Delancy objected to the Project specifically at the locations shortlisted at Ivybridge Retail Park.
Hogan Lovells	Hogan Lovells, a law firm acting on behalf of Coal Pension Properties Ltd stated that their client had serious concerns about the retail park as a preferred location for “Intermediate Shaft 1”. It stated that their client had concerns about major disruption and serious economic effects that the works would have on it and other major retail tenants at the retail park.
Coal Pension Properties Ltd	Also provided its own response to the consultation. It stated that it was the freeholder of two of the locations ('Ivybridge Retail Car Park' (north and south) being considered for the shaft. The organisation objected in its words “unreservedly” to the use of Ivybridge Retail Park's car parks being used, which it said would be devastating for the retail trade of the businesses occupying the units.
Intermediate Shaft 2	
Moormead Cricket Club	Expressed deep concerns about the Project and its potential impacts on Moormead Park. It was believed that the park's geographical restrictions would make it unsuitable for a large-scale project, and it had a number of concerns about negative effects, including implications for child safety and reduced air quality. Moormead Cricket Club was very concerned about negative consequences for the cricket club, suggesting that the proposal could force the club to close due to safety risks, financial liabilities, and the impossibility of carrying out activities during the construction period. It urged Thames Water and the relevant authorities to explore alternative solutions.
Middlesex County Cricket Club and Middlesex Cricket Board	Middlesex County Cricket Club and Middlesex Cricket Board was concerned about the proposals. It was stated that the development's potential negative impact on the club, players, and their health is of concern, particularly as the site is heavily used during the summer months for cricket matches and training sessions. It was feared that the proposals could disrupt these activities and negatively impact the safety and positive experiences of the players. Concerns were also raised on negative impacts to the wider community, and it was mentioned that it unequivocally objects to the TDRA site at Moormead and Bandy Recreation Ground and requests a new site that doesn't negatively impact sports clubs.
Moor Mead Football Club	Moor Mead Football Club was strongly opposed to Thames Water's proposals, which it believed would detrimentally impact Moormead Park. The club highlighted the park's importance as a communal green space and as its base. It stated that the proposals would reduce usable space, rendering it unwelcoming, potentially unusable, and unsafe for several years, causing

	significant social drawbacks and endangering the club's future development. The club urged Thames Water to reconsider its plans and explore alternative routes/sites.
Cllr Alexander Ehmann, St. Margarets and North Twickenham Ward	Cllr Ehmann raised a number of concerns about the proposed use of Moormead and Bandy Recreation Ground, which he deemed unacceptable due to its status as Metropolitan Open Land, its use by local schools, and the impact of the works on nearby properties. Cllr Ehmann was critical of what he believed to be Thames Water's failure to clarify whether it intended to use a national or local planning authority for the proposals and stated that no further progression should occur until this was clarified.
Cllr Ben Khosa, St Margarets and North Twickenham Ward	Cllr Khosa was opposed to the Project. He raised concerns about what he believed would be the potential damage to the Thames River's water quality, temperature, and ecology without clearly demonstrating in his opinion a need for such a project; the impact on residents due to the proposed pipeline's alignment, which could require compulsory sub-soil rights purchase from landowners; and what he believed to be the inappropriate selection of Moormead and Bandy Recreation Ground as potential shaft locations. Cllr Khosa was critical of what he believed was a lack of adequate information and consideration of social implications by Thames Water. Cllr Khosa highlighted the importance of Moormead Recreation Ground to local schools for physical recreation and ecological work, and the burden of construction work on local residents. He urged Thames Water to reconsider its planning approach and shaft locations, particularly ruling out the use of Moormead Recreation Ground.
Cllr Katie Mansfield St Margarets and North Twickenham Ward	Cllr Mansfield requested that Thames Water reconsidered the installation of shafts under Moormead Park and the Project as a whole due to what she considered would be resultant environmental and societal damage if it was to proceed.
Friends of the River Crane Environment (FORCE)	FORCE was concerned about the proposals. It was believed that construction work at the shaft and associated access routes would greatly impact the use of Moormead Park over many months. This it stated would have a significant detrimental impact on the health and wellbeing of people who use the park. FORCE suggested mitigations which could include the delivery of river restoration work at the Moormead Park site.
St. Stephen's Primary School	The school was concerned about plans that may disrupt Moormead Park, which it believed was essential to the school for delivering their national curriculum and for use as an off-site evacuation point. Concerns were also raised about wider negative impacts on the local community.
Friends of Moormead Park	The Friends of Moormead Park objected to both options for the second intermediate shaft, citing the historic significance of Moormead Park as a 'pleasure ground' since the 1890s. Thames Water's description of the park as 'low value grassland' was refuted, pointing out its year-round use by thousands of people for activities including sports, fitness programs, scouting, dog-

	<p>walking, and the annual St Margarets Fair. The group also raised concerns about the proposed construction site's proximity to the pavilion, outdoor gym, and cricket strip, and the potential disruption it could cause. Concerns were also raised about potential environmental impacts, including damage to land, habitat, woodland, and wildlife, as well as potential changes in oxygen and saline levels in the river water. Other concerns raised included how the proposal could have implications for health and safety, road safety, air quality and disruption during the construction phase. Option 2 was believed as the worst option as it was thought this would triple the distance HGVs would need to drive across the park, increase environmental impact, and block the recently opened pathway to Twickenham Railway Station during construction.</p>
Intermediate Shaft 3	
National Trust	<p>The National Trust was concerned about the location for the third intermediate shaft. It was worried about the loss of the riverside car park due to construction activities, which it stated would significantly impact its revenue. The National Trust insisted on alternative car parking provisions if the proposal was implemented. Negative environmental impacts were another concern, including heavy vehicle movements, noise pollution, air quality degradation, and visual disruption. It believed that such impacts could affect visitor enjoyment and further decrease visitor numbers, leading to revenue loss. The Trust requested that such disruptions should be mitigated, and if measures were not taken, it would object to the Project.</p>
Multiple site locations	
Sport England	<p>While it was welcomed that some sites had been removed as part of the site options appraisal, Sport England remained concerned about how some of the proposal locations might impact playing fields and open spaces. This included at the second intermediate shaft location (Options 1 and 2), and the third intermediate shaft (Option 2). The organisation was also concerned about the impact of several of the proposals on open space including the third intermediate shaft location (Option 1), the fourth intermediate shaft location (Options 1 and 3), and the sixth intermediate shaft location at Ham Green – it was stated that a children's play area would need to be relocated should the development at Ham Green be taken forward. It was suggested that the local community should be adequately compensated for the loss of open spaces, either through additional provision elsewhere or qualitative improvements to the space that remains.</p>
The London Borough of Hounslow	<p>The council raised several concerns, including potential traffic impacts from all proposed sites. It stated that Mogden Lane and Twickenham Road are already overburdened with traffic, which is worsened by the presence of significant trip generators including a primary school, retail park, supermarket, ambulance station,</p>

	<p>community centre, and Twickenham Stadium. The council believed that proposed options could halve the parking spaces at Ivybridge Retail Park, potentially causing more traffic issues. It also believed that there would be an increase in heavy goods vehicle movements on a residential street used by Ivybridge Primary School students. The council requested detailed information on vehicle movements, types, and distribution for both construction and staff traffic, to understand potential impacts and necessary mitigation measures.</p>
Thames River Users Group 8	<p>Thames River Users Group 8 provided comments on all five locations for intermediate shafts:</p> <p>Intermediate Shaft 1 – Option 2 was preferred. It was stated that from the information given, Option 2, at the northern end of the retail car parking facilities, would appear to have the least adverse impact and provide good access for ongoing maintenance. However, it stated that given the impact on retail car parking, removing around 50% of the total parking area during construction would be considerable.</p> <p>Intermediate Shaft 2 – the central site was preferred. However, it was questioned why the site had to be so far into the centre of the recreation ground? It was believed that it could be located at the northern end of the ground, south of the trees along Hill View Road, but out of their Protected Root Zone to avoid damage to the roots, and that this would appear to have less of an impact on the recreation ground and would require a much shorter access track. If this is not an option, it was stated that the central site would be preferable, having a shorter access track, and being further away from surrounding development and hence reducing the impact on surrounding residences and businesses during construction.</p> <p>Intermediate Shaft 3 – the Ham Street Car Park option was preferred, but with significant reservations. The main concerns were that a narrow street (Ham Street) would be heavily disrupted by construction traffic, and that the well-utilised car park would be enclosed within the construction boundary, impacting both visitors to Ham House and general public access to the river and Thames path. It was suggested that this option could only be acceptable if partial car park access was maintained, or temporary parking was set up in the nearby grassland, with appropriate surveys and restoration plans in place. The idea of adapting the slipway to the Thames for barge traffic, thereby reducing road traffic, was seen as potentially beneficial. It was stated that the alternative of placing the shaft in open land off Ham Street could have less impact on parking and river access, but might increase road traffic. Ultimately, while neither option is ideal, Ham Street Car Park was seen as a least bad option. However, the plan would</p>

	<p>need to consider temporary parking solutions, temporary diversion of the riverside path, and use of the river to decrease construction traffic on Ham Street.</p> <p>Intermediate Shaft 4 – Option 1 was preferred. However, it was believed that both options would impose construction traffic on the narrow Ham Street. However, Option 1 to the west of the playground would seem in its view to have a slightly lower impact as the traffic in and out of the construction site would only affect one road at a time, unlike Option 3 where it stated that the construction would be on either side of Ham Street and Riverside Drive and alongside Riverside Drive</p> <p>Intermediate Shaft 6 – Option 1 was preferred for its potential to offer greater separation between the works and surrounding development.</p>
<p>Richmond and Twickenham Friends of the Earth</p>	<p>Richmond and Twickenham Friends of the Earth had a number of concerns about proposed and potential site shaft locations. Including:</p> <p>Intermediate Shaft 1 – it was mentioned that if Ivybridge Retail Car Park was used as the site for the intermediate shaft, this would cause issues of dust, noise, and business disruption due to loss of parking.</p> <p>Intermediate Shaft 2 – it was stated that at Moormead and Bandy Recreation Ground Central is a Site of Local Importance for Nature Conservation, and as such the removal of trees and potential impact on the nearby River Crane habitat would be unacceptable, in addition to the disruption of sports and recreation and potential danger to children and the elderly from lorries.</p> <p>Intermediate Shaft 3 – it was mentioned that Ham Street Car Park is in a flood risk area, a conservation area, and an archaeological priority area, with potential harm to wildlife habitats.</p> <p>Intermediate Shaft 4 – having the shaft west of Riverside Drive playground may cause air quality, noise, and vibration issues for residential properties and disrupt access to the playground and green space.</p> <p>Intermediate Shaft 6 – it was mentioned that as Ham Lands west of Riverside Drive is within a nature reserve and SINC, construction could severely affect local ecology and nearby homes due to noise and impact on local road users.</p>

<p>Representative of St. Margarets fair</p>	<p>The representative commented on all five proposed site locations for intermediate shafts as follows:</p> <p>Intermediate Shaft 1 – the representative said that they would prefer that Thames Water use one of the carparks rather than open land. However, their ideal first preference would be the use of “sophisticated boring equipment” so that the intermediate shafts are not required.</p> <p>Intermediate Shaft 2 – it was stated that the south option would be preferred, but raised concerns that placing an access road across the site would render the Recreation Ground unusable for 3-4 years. It suggested temporarily widening Moormead Road and creation of an access road next to the current track to keep the main field open for sports and recreation. The representative was concerned that proposals would disrupt weekly sports activities for young people and the annual St. Margarets Fair. It urged consideration for the community impact, suggesting that funding the construction of a new Pavilion might earn community support. It reiterated a preference for using advanced boring equipment to avoid needing a shaft at Moormead Park, but if a shaft is necessary, it requested efforts to minimise community impact, to consider alternative site locations away from the park's centre, and plan for site access that would not involve a road across the middle of the park.</p> <p>Intermediate Shaft 3 – a car park location was preferred to using open land.</p> <p>Intermediate Shaft 4 – it was stated that neither of the options were good options as they take away open land. The representative asked for consideration of more sophisticated boring equipment that requires fewer access shafts, and stated that they didn't drop access shafts down every few hundred meters when digging the channel tunnel. It was concluded that the option proposed must just be about cost saving.</p> <p>Intermediate Shaft 6 – it was stated that none of the options are good as they all involve open land.</p>
<p>London Borough of Richmond-upon-Thames</p>	<p>The council raised a number of concerns about the locations for intermediate shafts as follows:</p> <p>Moormead and Bandy Recreation Ground – it was stated that the site, located centrally and to the south, is a designated Site of Importance for Nature Conservation (SINC) due to the presence of notable species such as stag beetles, hedgehogs, common lizards, and song thrushes. It was mentioned that the recreation ground was not just ecologically important, it is also a crucial amenity for</p>

	<p>two local schools that use it for physical education and local football and cricket clubs that use it for children's sports on weekends. Given the limited availability of such facilities in the Borough and the high demand for them, the council stated that any disruption to this site could lead to negative impacts on the community, particularly affecting school activities and local sports clubs.</p> <p>Ham Street Car Park – the council stated that while this site is not individually designated, it is significant due to its proximity to the River Thames and its tributaries, which are recognized as Sites of Metropolitan Importance for Nature Conservation (SMINC). Additionally, it borders Petersham Lodge Wood and Ham House Meadows, both of which are Sites of Borough Importance for Nature Conservation.</p> <p>Land west of Riverside Drive playground – this site is designated as Metropolitan Open Land.</p> <p>Ham Lands / Ham Lands west of Riverside Drive – this site is a Local Nature Reserve (LNR) and a Site of Metropolitan Importance for Nature Conservation (SMINC), housing a rich variety of ecological interests. These include badger colonies, an extensive bat population inclusive of 8 out of the borough's recorded 11 species and two nationally rare species - Leisler's bat and Nathusius' pipistrelle. It also features reedbeds, ponds/lakes, broadleaved woodland, and species-rich grassland, forming a significant dark corridor along the River Thames, which is also a SMINC. The site is home to several species identified in the Priority/Richmond Biodiversity Action Plan, such as stag beetles, hedgehogs, house sparrows, song thrushes, kingfishers, white letter hairstreaks, swifts, cuckoos, hobbies, sand martins, common toads, and slow worms, and is a habitat for many rare plants. The Thames Young Mariners Lake is a key site for wintering birds/wildfowl. In addition to its ecological significance, the council stated that the site serves as a cherished amenity for residents and visitors, contributing to informal recreation, health, and wellbeing.</p> <p>Ham Riverside Meadows (Ham Lands) – it was stated that this site, which is designated as Metropolitan Open Land, is ecologically significant as it serves as an important ecological corridor where the White letter hairstreak has been recorded. Additionally, it forms part of the River Thames and Tidal Tributaries Sites of Metropolitan Importance for Nature Conservation.</p> <p>Ham Village Green – the site, designated as a Village Green and Metropolitan Open Land, holds key ecological importance,</p>
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	<p>particularly with the presence of stag beetles. Currently, it is involved in the controversial Ham Close development. Any additional disruption to the site will lead to a temporary increase in the loss of green space and amenity, which could further exacerbate tensions with local residents.</p>
London Wildlife Trust	<p>The London Wildlife Trust provided comments on all of the proposed locations:</p> <p>Intermediate Shaft 1 – Ivybridge Retail Car Park (north) and (south) were preferred for their minimal ecological damage they would cause.</p> <p>Intermediate Shaft 2 – it was mentioned that neither options are ideal due to their impacts on open green space, but Option 1: Moormead and Bandy Recreation Ground central was preferred. Restoration of grassland after works are completed would provide an opportunity to increase the diversity of the grassland in places.</p> <p>Intermediate Shaft 3 – apart from the potential of flood risk, Option 1 was supported: it was stated that Ham Street car park, due to its current land use would result in less damage to existing ecological assets.</p> <p>Intermediate Shaft 4 – although there is little difference to both options, Option 3 was preferred: Land at Riverside Drive and Ham Street - it was acknowledged there are no ecological designations or priority habitats on either site and both sites have a low ecological value; and that upon completion there should be opportunities to enhance the greenspaces here.</p> <p>Intermediate Shaft 6 – it was stated that for obvious ecological implications - no matter that these may be short-term and mitigated for – London Wildlife Trust did not support Option 1 over Option 3: Land at Dukes Avenue (despite the impact this might have on neighbouring properties with construction noise and road diversions). It was stated that Option 1 would result in development within a SINC, and without appropriate mitigation secured could set a worrying precedent.</p>

Recycled Water Discharge and River Water Abstraction Sites

Environment and heritage groups	
Thames River Users Group 8	<p>It was stated that the consultation document has identified the proposed site for abstraction and discharge as sensitive and well-used, with multiple designations such as SINC areas, Metropolitan Open Land, a Conservation Area, and an Archaeological Priority Area. The site is also part of the Hampton to Kew section of the Thames Landscape Strategy, aimed at conserving an important river landscape. Given the area's recreational use and ecological importance, there are strong objections to plans indicating that the tow path and Burnell Avenue Play Space will be inaccessible for about two years. Aside from construction disturbance, there are concerns about the permanent impact of the industrial-style facilities on the semi-natural open space, contradicting the Arcadian Thames riverside retention and enhancement policy. It was suggested that Thames Water should minimise the construction area, providing a temporary path, and reducing construction time. It was also proposed to engage a landscape designer to ensure the facility fits into the semi-rural setting and minimally impacts the diverse uses of the Thames area. Lastly, it questioned the positioning of the shaft access in the middle of the play area and the spread of the permanent structures associated with the abstraction facility, suggesting that they could be relocated to cause less disturbance and to facilitate easier screening.</p>
Maidenhead to Teddington Catchment Partnership	<p>The Partnership stated that was seeking information on several aspects of the Project. Firstly, it wanted to know about the considerations for ongoing maintenance and access. Secondly, it was interested in the visual impacts of the scheme from various perspectives, such as from the river, the towpath, and the community viewpoint, as well as its impacts on habitats/wildlife corridors and public access. It was also curious to know if the new tertiary treatment would improve the overall treatment standard at Mogden, resulting in better quality effluent discharged at Teddington. While acknowledging the water shortage in the south-east and the potential necessity of water recycling, it expressed mixed views on the Project, with some seeing it as a 'quick fix' compared to other potential solutions like new reservoirs and water transfers. Finally, it asked for greater transparency from Thames Water about the other options considered besides the Teddington direct river abstraction and want further clarification to gain support for the proposed works at Teddington.</p>

Local government organisations	
The London Borough of Richmond-upon-Thames	The council was concerned about environmental impact of the location of outfall structure at Burnell Avenue. It was stated that the proposed location lies partially within the Ham Lands Site of Importance for Nature Conservation (SINC) with key ecological interest. It stated further that this would be very close to a main badger sett and other outlier setts, and badger foraging territory. An extremely important dark corridor buffering the River Thames, peak nightly counts exceeding 200 Daubenton's bats. At least six species of bat recorded just down-river at Teddington Lock. Stag beetle, common toad and hedgehog all recorded on site.
Other organisations	
Representative of St. Margarets Fair	The representative requested the publication of alternative solutions for transferring water to the North London Reservoir that do not involve the use of the tunnel from Teddington. The spokesperson was also seeking more information on the quality of the treated water that would be released into the river, as the documents indicate that it won't be of drinking water standard, which is a concern due to the river's recreational use for activities, including stand-up paddleboarding, sailing, rowing, and swimming. The documents' claim that the water will meet current regulations was seen as vague, and they expressed concern about the safety of the treated water, particularly for children.
St Richards Church of England Primary School	The school said it was very concerned about pollution/smell issues and needed more information to understand the effects this will have on the local environment for their families.

Connection to the Thames Lee Tunnel Raw Water Main

Environment and heritage groups	
Thames River Users Group 8	Thames River Users Group 8 preferred Option 1 despite its greater impact on ecology, green space, and amenity, as the alternative option could have traffic issues and potentially extend the construction period due to its size. It was noted an existing track from the proposed construction site for the abstraction/outfall facility to the Option 1 shaft area, suggesting that tree removal might be minimized to pruning and surgery, depending on vehicle size. It was proposed that if the shaft construction is concurrent with the abstraction/outfall facility, the shaft construction site could be smaller, with other facilities contained on the main site on the Burnell Play Area. The group agreed with the need for careful restoration and ideally enhancement of biodiversity and amenity facilities (paths etc) as stated in the consultation document.
London Wildlife Trust	London Wildlife Trust preferred land at Tudor Drive, as this would cause far less ecological damage compared to Option 1, which would result in an acknowledged loss of habitat from the Royal Park Gate Open Space SINC, as well as potential impacts on protected and/or priority species as well as a number of trees subject to tree preservation orders (all which would require prior assessment and appropriate mitigations).
Other organisations	
Representative of St. Margarets Fair	The representative said that while they did not strong views on either site, they would like to understand whether either site is necessary and whether there is a credible alternative to using the tunnel.
St. Richards Church of England Primary School	The school requested more information about this aspect of the proposed Project.

The process undertaken to identify site options

Environment and heritage groups	
The Friends of Moormead Park	The Friends of Moormead Park made reference to their previous comments regarding the second intermediate shaft. The organisation asked that Thames Water publishes all of its research and analysis undertaken so far to identify the two site options on Moormead Park. The group said that it had significant concerns that the works was extremely 'high level' and believed had completely failed to recognise the potential impact on the local community.
River Thames Users Group 8	River Thames Users Group 8 said that the options appeared to have been carefully selected and assessed. However, it mentioned about where Thames Water had stated that it had still to contact some potential key landowners about the proposals. It was questioned whether such stakeholders should have been within the first stage of consultation, including the National Trust, in case their input meant that some of the options were not possible to progress.
Other organisations	
Representative from St. Margarets Fair	The representative was sceptical about the lack of alternative proposals to using the tunnel, suggesting that there could be other ways to get water to the reservoir from different sources or rivers. The spokesperson said that they have found the chosen sites undesirable but understand the selection rationale. Regarding Moormead, it was believed that the chosen access road would be more convenient for the project than beneficial to the local community. It was suggested that the site selection process would appear to favour a less expensive tunnel boring method, resulting in more sites. It stated that it would prefer Thames Water to invest in a proposal that minimises impact on local communities, rather than choosing the cheapest option to maximise shareholder returns.
St Richard's Church of England Primary School	St Richard's Church of England Primary School stated that it had not received enough direct information to the school about what is happening. It mentioned that many of their parents had been informing the school of potential works but that it was difficult to understand what was fact and what was rumour. The school was concerned around the impact to Ham lands as the treated water disposal because as a school often uses this natural resource for learning opportunities.
Middlesex County Cricket Club and Middlesex Cricket Board	Middlesex County Cricket Club and Middlesex Cricket Board mentioned that sports participation can at times be fragile, and disruption caused by events such as ground closures and scarring

	of grounds playing surfaces, can result in people stopping play and participation. It was requested that there was a need for review of any open park sites where any member based or club-based participation would negatively be impacted by proposed intermediate shafts and pipeline development.
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Other comments

Environment and heritage groups	
Ham and Petersham Association and Amenities Group	Ham and Petersham Association and Amenities Group raised concerns about the Project in terms of harm to protected local habitats, degradation of the water environment, and damage to the protected local habitats and parkland. The organisation was very concerned about how aquatic life, recreational river users and anglers could be negatively affected. It was critical of the Project and proposals for in its opinion not recognising the physical and mental health, social, and recreational benefits that open spaces and the Thames landscape provide. There was also dissatisfaction with community engagement and that as a statutory consultee it said it had not been consulted. Its response concluded with an urgent request to stop the Project.
The Kew Society	The Kew Society stated that while not directly affected by proposals it had submitted a response to the consultation due to the enjoyment its residents have for the Thames towpath walks and the Teddington and Ham areas. It stated that it supported objections by local residents and Richmond Council, noting what it said were the unacceptable impacts on the local nature reserve and Site of Importance for Nature Conservation (SINC), the adverse effects on Ham village and its residents, and it questioned the value placed on the environmental impact in Thames Water's claim that the project is the best value drought mitigation solution. Doubts are also raised about the economic feasibility of a scheme that needs to operate at 25% capacity continuously for infrequently needed full capacity. Lastly, it was stated that the increased probability and severity of storm water discharges from the Isleworth Ait outfall, poses a health risk to water sport participants using this part of the river.
Save Our Lands And River (SOLAR)	SOLAR said that it represented around 600,000 people, with around 60 organisations opposing the Project and nearly 30,000 people signing a petition against it. SOLAR objected to the Project in its entirety, arguing that Thames Water had failed to provide necessary materials and information for a fair judgment on the proposals. Specific objections included lack of information about the "best value" model, the perceived lack of exploration of better alternatives, and potential harm to the river's ecosystem from putting treated effluent into the Thames in drought conditions.
Historic England	Historic England said that its comments were general comments. The organisation emphasised the potential for damage to or loss of vulnerable and irreplaceable heritage assets due to changes in water levels and quality and the provision of new water supply and re-use infrastructure. It highlighted a challenge of understanding these impacts, especially for unrecorded

	<p>paleoenvironmental and/or palaeoecological remains, which could be deeply buried and potentially waterlogged. Historic England said that it would encourage Thames Water to be mindful of potential impacts on water-related heritage assets, vegetation in historic parks and gardens, and waterlogged or buried archaeological resources.</p>
Habitats and Heritage	<p>Habitats and Heritage raised a number of concerns about the TDRA and questioned its necessity. It suggested alternative strategies such as a permanent hosepipe ban or addressing water wastage would be a more practical and less impactful approach. The organisation also had grave concerns about the Project's impact on the Thames' ecology, particularly the abstraction of a quarter of the river's flow and the potential increase in temperature, salinity, nutrients, and pollutants. It was suggested that it would make more sense to put the treated effluent directly into the Lee Tunnel. The organisation also said that several sites threatened by the proposed TDRA are currently managed for nature conservation and public enjoyment, and that the Project could significantly impact these areas. The Project could also disrupt recreational activities, including swimming, kayaking, canoeing, and sailing. As such Habitats and Heritage asked Thames Water to reconsider going ahead with the Project, and was critical about a perceived lack of shared alternative options and their associated costs.</p>
Broom Water Association	<p>Broom Water Association was opposed to the TDRA in its entirety. It argued that the model selecting this scheme was flawed and unreliable, and that simpler, cheaper, and greener alternatives had not been sufficiently considered. Concerns were raised about permanent damage to protected land and biodiversity, potential harm to the river's ecosystem due to treated effluent, and the failure to remove harmful elements from the treated water. The organisation also believed that there had been a lack of social and health impact studies for affected communities, potential underestimation of customer costs, increased flood risk, and the availability of alternative proposals providing more water capacity at better quality. It was suggested that water for East London in drought conditions could be found by halting the current water transfer to East Suffolk. The Broom Water Association said that it opposed the Project due to its environmental damage, cost, and unacceptability in its opinion.</p>
Thames River Boat Project	<p>Thames River Boat Project was opposed to the TDRA and criticised the consultation's focus on construction and abstraction site details rather than the plan's principle. It was believed that there had not been a clear assessment of alternatives such as reducing leaks and other demand-side measures. The organisation raised concerns about the impact on local</p>

	<p>communities, the negative effects on a Metropolitan Site of Special Interest for Nature Conservation, and widespread destruction of local trees and wildlife. It also strongly opposed the potential long-term impact on water quality due to the return of treated effluent to the Thames, questioning the untested technology and the ability of the Environment Agency to set and monitor standards. The presence of "forever chemicals" and the viral and bacterial makeup of the wastewater were also pointed out as concerns. It was concluded that the Project offered minimal water supply benefits, could cause significant local disruption, and potentially harm the Thames' water quality.</p>
<p>Richmond and Twickenham Friends of the Earth</p>	<p>Richmond and Twickenham Friends of the Earth stated that it continued to oppose the TDRA, critiquing the absence of real environmental or social impact assessments. The organisation raised concerns about extensive ecological damage to flora, fauna, and aquatic life, and the potential harm from treated effluent containing antibiotics, contaminants, and E. coli. It argued that replacing cool river water with warmer treated effluent could harm aquatic wildlife and potentially cause toxic algal blooms. The organisation also criticised the social impact of construction, such as restricted community land access, dust, noise, air pollution, and heavy lorry congestion. It noted that the construction would disrupt local schools and community events that use Moormead, and limit access to Burnell and Dysart open spaces, popular areas for swimmers, walkers, and river users.</p>
<p>Maidenhead to Teddington Catchment Partnership</p>	<p>Maidenhead to Teddington Catchment Partnership sought assurance that the new abstraction would not extract more water than the new discharge would replace. It asked for information on the proposed mitigation measures, including how it would address concerns about 'forever chemicals', whether the environmental impact assessment will test for such substances, and if these results would be made public. The partnership also asked about measures to mitigate visual and noise pollution. It was curious to know if Thames Water had considered other examples of similar cases in the Thames Basin, such as Eton Wick, and what lessons have been learned from these that could be applied to Teddington. It also questioned what plans are in place for Thames Water to reduce abstraction from the chalk streams in the Chilterns, suggesting that this could allow more water to flow downstream, recover flows, and possibly enable additional water extraction from the Lower Thames region while protecting chalk streams. It also asked how the infrastructure will cope with increased flow and expressed concern that the project could detract from other smaller projects in the catchment, with some partnership members calling for higher treatment standards across the Thames Basin.</p>

Friends of Moormead Park	<p>Friends of Moormead Park asserted that Thames Water had not adhered to the Gunning Principles of fair and lawful public consultation at this stage of the process. These principles state that consultation must occur when proposals are still formative, sufficient reasons for any proposal should be provided for intelligent consideration and response, adequate time should be given for consideration and response (typically 12 weeks or longer depending on the proposals), and the decision maker must demonstrate conscientious consideration of comments and responses. The Friends of Moormead Park response aligns with the broader Save Our Lands and River campaign request that Thames Water establish a Moormead-focused stakeholder committee to facilitate discussions about the TDRA's impact on Moormead Park, with participation from sports and recreational associations and local schools that rely on uninterrupted access to the park. It was expected that this committee would have regular dialogue with Thames Water and directly influence decision-making in relation to Moormead Park.</p>
Elected representatives	
Cllr Julia Neden-Watts, London Borough of Richmond-upon-Thames	<p>In response to concerns raised from a local resident who was objecting to the TDRA, Cllr Neden-Watts responded to confirm that the council would be responding strongly to the consultation. Cllr Neden-Watt mentioned that they had already brought a motion to the council expressing concerns about the impact of the TDRA on river health, ecology, local parks and open spaces, and called for the government to require Thames Water to consider less damaging alternatives. Cllr Neden-Watts said that the motion was unanimously supported by councillors and that she continues to be very concerned about the potential impact of the proposals.</p>
Sarah Olney, MP for Richmond Park	<p>Sarah Olney was critical of Thames Water's approach to the consultation, arguing that it did not adequately allow residents to comment on the suitability of the TDRA for their community. Instead, she believed that the consultation was framed more around how the TDRA should be constructed, and did not allow for outright objection which Sarah Olney believed could lead to responses being misinterpreted as tacit support for the TDRA. It was emphasized that due to these perceived weaknesses in the consultation process, any conclusions drawn from it should be treated with caution. In particular, it was stressed that a response suggesting a pipeline route should not be interpreted as support for the TDRA. Sarah Olney was also concerned about impact of construction and how water quality could be affected. She concluded by saying that in her view and the view of her constituents that the Project should be rejected in its entirety, and</p>

	that Thames Water should consider an alternative plan to secure London's water supply for future decades.
Cllr Andrée Frieze Councillor for Ham, Petersham & Richmond Riverside	Cllr Frieze responded to an email from a local resident who had been objecting to the TDRA. Cllr Frieze said she agreed with the resident's objection, and was all doing what she can to stop the proposals.
Munira Wilson, MP for Twickenham	Munira Wilson objected to the TDRA and believed it was in her words "deeply flawed". She was concerned about resultant environmental impacts, as well as impacts of construction and on local communities if the proposals were to proceed. She called into question who would receive "Best Value", and suggested that what was proposed would be bad for residents, the environment, water bill payers, and that it does not offer a viable solution. She requested that Thames Water remove the TDRA as an option within the Water Resources Management Plan.
Lord Goldsmith of Richmond Park	Lord Goldsmith of Richmond Park was concerned about the Project. He believed it was both costly and risky with the potential to increase water pollution, causing significant damage to the Ham Lands nature reserve and its biodiversity, and resulting in the permanent loss of roughly five acres of biodiverse land. He also stated that local residents would face over three years of disruption, including from heavy goods vehicle movements, 24-hour tunnelling operations, and noisy piledriving operations. Lord Goldsmith said that he understood that Thames Water is considering two other schemes that wouldn't impact nature reserves or conservation sites. He asked for his letter added to, in his words, "the growing opposition", and believing the proposal should be abandoned.
Local government organisations	
The Royal Borough of Kingston upon Thames	The council was concerned about the chosen locations for the Project and requested more information about the selection process and rationale behind choosing Kingston. It believed that current details about the potential impact of the construction on Kingston and North Kingston residents was unclear. It was concerned about the impact of the infrastructure on the riverbank's aesthetic, character, and majesty. Furthermore, the council was concerned about the wider ecological impact of the TDRA on the Thames landscape, which it stated was enjoyed by residents and visitors. It requested greater clarity with regard to the decision making process and the nature of any statutory consultations that are required as a part of the scheme gateway approval.

<p>The London Borough of Richmond-upon-Thames</p>	<p>The council stated it had a number of concerns about the TDRA, and were not supportive at this stage. The council believed that the Project would have significantly negative and irreversible impact on the biodiversity of the proposed sites, with the SINC's and LNR being of utmost concern. It was stated that the plans could lead to a loss of Biodiversity Action Plan Priority Habitat at Ham Lands and could cause habitat fragmentation detrimental to Priority Species at all sites. It was stated further that Ham Lands, Ham Riverside Meadows, Moormead and Bandy, and the land at Burnell Avenue are "crucial ecological corridors" that need preservation and enhancement for both structural habitat continuity and the absence of light pollution affecting nocturnal wildlife. In addition to biodiversity, these sites hold great amenity value, providing cherished open spaces for residents and visitors. The proposed TDRA is anticipated to have a negative impact on users, which will likely be reflected in community information events. Overall, there is serious concern about the proposal, and current support is lacking. However, there's a willingness to discuss concerns in more detail, with the aim of understanding how Biodiversity Net Gain could be achieved at each site and how the loss of amenity space could be mitigated.</p>
<p>Other organisations</p>	
<p>Richmond and Ham Football Club and Kew & Ham Sports Association</p>	<p>The association was strongly opposed to the TDRA. A chief concern revolved around potential environmental impact, including how local wildlife could be negatively affected. The association mentioned negative effects such as tree felling, noise and waste pollution during construction, and what they considered would be ongoing pollution of waterways. The welfare of the local bat population, which depends on river line trees and waterways, was of particular concern. The association included the response proposed by Save Ham Lands and River (SHL&R) and said that they endorsed that response.</p>
<p>Lender Sea Scouts</p>	<p>Lender Sea Scouts objected to Thames Water's proposed water abstraction scheme at Teddington Lock. They argued that the water in this area is already heavily polluted due to Thames Water regularly pumping untreated sewage into it. It was believed that such pollution affects the safety of boating activities organised for young people. Leader Sea Scouts did not trust Thames Water to ensure water quality, citing its history of fines and illegal actions, as well as ongoing investigations by the regulator. It also criticised the consultation process, claiming that it appeared that no alternative schemes had been seriously considered or detailed, and that local residents have been invited to comment on points of detail.</p>

Petersham and Ham Sea Scouts	Petersham and Ham Sea Scouts was concerned that the proposals could degrade the quality of water in the River Thames downstream of Teddington Lock. It was believed that this could impact the Sea Scouts' water activities due to deteriorating water quality. The organisation requested that the current proposals are abandoned and that an alternative water source for north east London be found, one that does not risk damaging the water quality below Teddington Lock
Grey Court School	The school was concerned about the TDRA. Such concerns included potential river pollution, which could affect community members who row and swim in the River Thames. There was also worry about the impact on Ham Lands. It expected that the Project would increase congestion with additional traffic, particularly lorries, in an area already believed to be strained in terms of transport and amenities. The school also stated that the timing of the Project would coincide with another development at Ham Close development, and that this could present challenges for children commuting to school.
The Teddington Bluetits	The Teddington Bluetits raised a number of objections, including a belief that the "best value" model which selected TDRA as the preferred supply option was flawed in methodology and was unreliable. It also raised several objections about how the TDRA would be damaging to the environment. It was believed that there would be better and greener alternatives that had not been considered in detail.
St. Richards Church of England Primary School	The school stated that it had a number of parents who were very opposed to the proposed works being in Ham and it wanted to ensure that it understood what was happening. It was concerned that the proposed works might take place at the same time as another development at Ham Close, and that this would negatively impact the school and community.

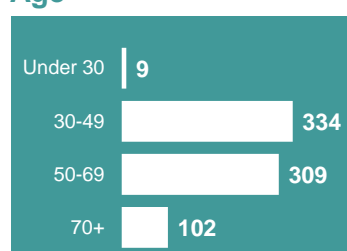
Appendix C – Profile of those who responded to the consultation

Those who responded to the consultation using the response form were asked if they wished to provide more information about themselves. This section includes a summary graphic of those who choose to provide additional demographic information. It excludes those who provided their responses offline.

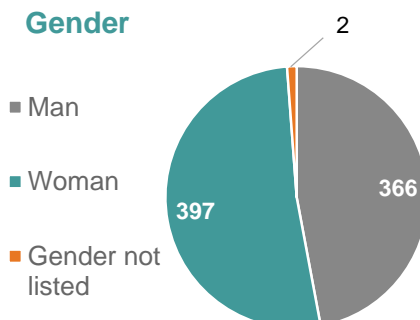
Figure C1: Number of consultees who responded using the response form by key group

Respondent profile (numbers)

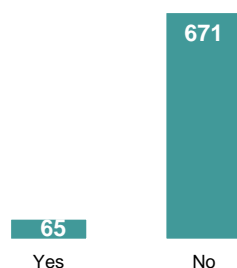
Age



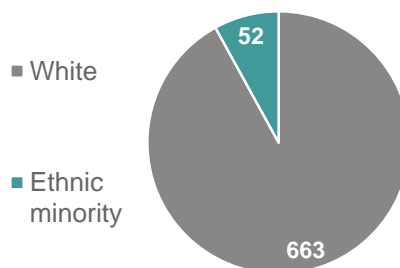
Gender



Disability or long-term illness



Ethnicity



Appendix D – Response form

Teddington Direct River Abstraction Site Options

Public Consultation

Autumn 2023



We want your views on the initial site options for the Teddington Direct River Abstraction project. You can share your feedback using this form but if your response is likely to be lengthy or technical you could also:

- email us at TDRA@ipsos.com or
- write to us at FREEPOST TDRA CONSULTATION.

Please only use the response methods described here to respond to the consultation. We cannot guarantee that responses sent to other addresses will be considered. Please send your response by 11.59pm on 11 December 2023, when consultation closes.

For more information about the site options we've considered, please read our Site Options Consultation Document, which you can find at thames-sro.co.uk/supportingdocuments

If you need assistance completing this questionnaire, or for material in other formats, please email us on info.tdra@thameswater.co.uk or phone us on **0800 316 9800**.

Confidentiality and Data Protection: Thames Water will store and use your personal data in relation to the Site Options public consultation on the Teddington Direct River Abstraction project. This is important so we can record accurately and analyse any feedback and/or questions raised. It also allows us to communicate with you as work progresses and ensures that you can engage throughout the process, including the subsequent stages of work up to the final approval of the project and the process to achieve planning consent.

If you'd like us to be able to update you about the project, please provide your email address

You can opt-out from receiving updates from us at any time by emailing us at info.tdra@thameswater.co.uk

☐ If you don't want us to contact you again, please tick this box

Our privacy notice covering the use of personal data for consultations can be found [here](#). To find out more about how we use and protect personal data including your data subject rights please visit our main website ([Privacy policy](#) | [Legal](#) | [Thames Water](#)).

Please write your response within the boxes below and, if you need to, attach additional information to the response form ensuring you clearly state the question you are answering.

Part 1 About you:

1. Please provide your name

2. What is your postcode?

Providing your postcode is not compulsory but may be helpful when we analyse your feedback

3. Are you responding on behalf of a business or organisation? ☐ Yes ☐ no

4. If yes, please include the name of your organisation

5. What category of organisation or group are you representing? Please select all that apply

- | | |
|---|--|
| <input type="checkbox"/> Business | <input type="checkbox"/> Statutory agency |
| <input type="checkbox"/> Elected representative (MPs, and local councillors) | <input type="checkbox"/> Real estate, housing associations or property-related organisations |
| <input type="checkbox"/> Environment, heritage, amenity, or community group | <input type="checkbox"/> Transport, infrastructure or utility organisation |
| <input type="checkbox"/> Local government (county and district councils, parish and town councils and local partnerships) | <input type="checkbox"/> Other |
| <input type="checkbox"/> Other representative group (includes trade unions, political parties and professional bodies) | <input type="checkbox"/> Prefer not to say |

Please note, if you are providing a response on behalf of an organisation or group, the name and details of the organisation may be subject to publication or appear in a consultation report.

[Cont...](#)

6. How did you hear about this consultation?

- | | |
|--|--|
| <input type="checkbox"/> Letter or postcard | <input type="checkbox"/> Word of mouth |
| <input type="checkbox"/> Newspaper advertisement | <input type="checkbox"/> Community group or recreational group |
| <input type="checkbox"/> Social media (e.g. Facebook, Twitter/X, Whatsapp) | <input type="checkbox"/> Other (please state) <input type="text"/> |

Part 2 Relating to the project:

7. We have identified Mogden sewage treatment works (STW) as being the location for the proposed tertiary treatment facility and start of the pipeline.

Can you give us your views on the use of Mogden STW for these structures and reasons for these views?

8. Shaft site options

There is the potential to use the below locations for pipeline shafts and their construction. Not all locations may be required.

a. Intermediate shaft 1 – we are considering three options for the location of the first intermediate shaft. These are:

- Ivybridge Retail Car Park (north) – our currently preferred site
- Ivybridge Retail Car Park (south) – an alternative site
- Land between Summerwood Road and Ivybridge Retail Park – an alternative site.

Could you give us your views on use of these sites and reasons for your views?

b. Intermediate shaft 2 – we are considering two options for the location of the second intermediate shaft. These are:

- Moormead and Bandy Recreation Ground (central) – our currently preferred site
- Moormead and Bandy Recreation Ground (south) – an alternative site

Could you give us your views on use of these sites and reasons for your views?

c. Intermediate shaft 3 – we are considering two options for the location of the third intermediate shaft. These are:

- Ham Street Car Park - our currently preferred site
- Land to the south of Ham Street Car Park and west of Ham Street - an alternative site

Could you give us your views on use of these sites and reasons for your views?

d. Intermediate shaft 4 – we are considering two options for the location of the fourth intermediate shaft. These are:

- Land to the west of Riverside Drive playground - our currently preferred site
- Land at Riverside Drive and Ham Street - an alternative site

Could you give us your views on use of these sites and reasons for your views?

Intermediate shaft 5 - we have considered one option for the location of a fifth intermediate shaft, which has been removed as a more direct route has been identified. More details are available on our website at thames-sro.co.uk/supportingdocuments

e. Intermediate shaft 6 – we are considering three options for the location of the sixth intermediate shaft. These are:

- Ham Lands, west of Riverside Drive - our currently preferred site
- Land at Dukes Avenue - an alternative site
- Ham Green - an alternative site

Could you give us your views on use of these sites and reasons for your views?

9. Recycled Water Discharge and River Water Abstraction sites

Our emerging proposals indicate that the river abstraction facilities would be situated upstream of Teddington Weir. **Is there anything we should take into account in selecting the sites for discharge and abstraction?**

10. Connection to the Thames Lee Tunnel Raw Water Main

For our connection pipeline to the Thames Lee Tunnel we require a further shaft site to facilitate a connection between our new pipeline and the existing raw water main. For this we are considering two options, either land at Northweald Lane or at Tudor Drive. **Could you give us your views on use of these two sites and reasons for your views?**

11. Do you have any comments on the process we undertook to identify site options?

12. Do you have any other comments about our proposals at this stage of the process?

Part 3 Consultation and engagement:

13. Were the consultation materials clear and easy to understand? ☐ Yes ☐ no ☐ don't know

14. We are keen to keep you informed about the project. How do you want us to communicate with you?

☐ Newsletters

☐ Through face to face events

☐ Other (please specify)

Part 4 Equality monitoring:

These questions are optional. By monitoring the answers you provide, we can ensure that our project does not discriminate against anyone with a protected characteristic as defined in the Equality Act 2010.

15. The Equality Act 2010 protects people against discrimination based on nine protected characteristics. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Please explain if you think our proposals will discriminate against people with protected characteristics:

16. Which of the following best describes your gender?

- ☐ Man ☐ Non-binary ☐ Prefer not to say
☐ Woman ☐ My gender is not listed

17. What is your age group? If you are under 18 please tick the box and ask a parent, teacher or guardian to sign below to indicate they are happy for your response to be considered.

- ☐ Under 18 ☐ 19-29 ☐ 30-39 ☐ 40-49 ☐ 50-59 ☐ 60-69 ☐ 70-79 ☐ 80+

Parent/teacher/guardian name box

Parent/teacher/guardian signature box

18. What is your ethnic group? Which of the following best describes you?

A. White

- ☐ English/Welsh/Scottish/Northern Irish/British
☐ Irish
☐ Gypsy or Irish Traveller
☐ Any other White background

B. Mixed/Multiple ethnic groups

- ☐ White and Black Caribbean
☐ White and Black African
☐ White and Asian
☐ Any other Mixed/Multiple ethnic background

C. Asian/Asian British

- ☐ Indian
☐ Pakistani
☐ Bangladeshi
☐ Chinese
☐ Any other Asian background

D. Black/African/Caribbean/Black British

- ☐ African
☐ Caribbean
☐ Any other Black/African/Caribbean background

E. Other ethnic group

- ☐ Arab
☐ Any other ethnic group

F. Prefer not to say

☐

19. Do you consider yourself or anyone in your household to be officially disabled defined by the Equality Act 2010 as 'A physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out day-to-day activities'?

- ☐ Yes
☐ No
☐ Prefer not to say

Thank you for taking part
in this consultation

Appendix E – Information leaflet



Teddington Direct River Abstraction

A vital drought resilience project
for London

Autumn 2023





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Foreword



*Nevil Muncaster,
Strategic Partnerships Director,
Thames Water*

Water is essential for life. Every day, we supply top quality drinking water to customers and businesses across London and the Thames Valley.

In the face of the challenges of climate change and population growth, it's more important than ever that we have a plan for the future, to secure our water supplies.

While no one can be absolutely certain how climate change and population growth will impact us over the next 50 to 100 years, and beyond, it's important that we plan for a drier future. As such we've been working with other water companies to develop strategic plans for water supplies for London and the South East.

The Teddington Direct River Abstraction (DRA) project is one of several being taken forward to help secure our future water supplies.

We know that for Londoners the Thames is more than just a river—it's an historical and cultural landmark that has shaped the city's identity for centuries. Moreover, the river and its banks are a home for a remarkable array of species and they provide recreational opportunities for residents and visitors alike.

Our proposals for the Teddington DRA project are at a very early stage and we want to work with our stakeholders and with local communities to shape them. As such, we're holding a public consultation on our initial site options and we'd be very grateful for your feedback.

Thank you.

Planning for the future

Every day we turn on our taps to fill glasses of water, make cups of tea, wash, cook and clean. We rely on water to run our schools, hospitals, essential services, and businesses. We need it to keep the world around us healthy too.

We forecast that we face a shortfall of over 1 billion litres of water every day for our customers in the next 50 years – enough to fill around 400 Olympic-sized swimming pools.

The main factors that affect how much additional water we'll need in the future are:

- a growing population
- a changing climate
- the need to provide increased resilience to droughts
- reductions in the amount of water we take from rivers and groundwater to improve the environment

This is a huge challenge that we're taking very seriously.

Our long-term plan

Under the umbrella of Water Resources South East, we've been working with five other water companies in the south-east, as well as with customers, stakeholders and other water-using sectors, to develop plans to address our future water resources challenges.

We published our revised draft Water Resources Management Plan 2024 in the summer, following a public consultation earlier in the year, and you can find it at thames-wrmp.co.uk/document-library

Feedback

We launched a public consultation on our draft Water Resources Management Plan in December 2022 and received over 1,680 responses. Since the consultation closed in March 2023 we've considered all of the feedback received, along with new information and policy requirements, and we've published our Statement of Response, which can be found at thames-wrmp.co.uk/document-library

Subject to acceptance by the Secretary of State for Environment, Food and Rural Affairs, our revised draft Plan lays the foundation for a wide range of solutions to plug the shortfall between the amount of water we have and the amount we need. These measures are designed to safeguard supplies and decrease the likelihood of facing water shortages during prolonged drought periods.

Along with setting a target to halve leakage by 2050, and installing a further one million smart water meters in customers' homes, at the centre of our Plan is a vital new water resource for London.

Fixing leaks

We're tackling leakage in our network, with 1,000 leaks fixed per week. However, we recognise that we can do better.

In our revised draft Plan, we've committed to halve the amount of water we lose through leaks by 2050. This is a challenging and ambitious target but one we're determined to meet.

Tackling leakage, though, will not on its own solve the future water supply challenge that we're facing. We also need to work with our customers to make sure we use our water supplies carefully and invest in new sources of water.



A vital new drought resilience project for London

We're proposing a new river abstraction on the River Thames, supported by water recycling.

The Teddington DRA project could provide up to 75 million litres of water each day during periods of prolonged dry weather.

Water would be abstracted from the river upstream of Teddington Weir and transferred along a section of new connecting pipeline to an existing underground tunnel to our reservoirs to become drinking water.

What do we mean by abstraction?

Abstraction is the process of taking water from a river, or groundwater, for various uses, such as drinking water, agricultural and industrial processes.

Abstracting water from rivers is crucial but must be carefully managed to avoid negative impacts on the environment and the river's ecological balance. Sustainable abstraction approaches, like the proposed Teddington DRA project, take into account factors like the river's flow, ecology, water quality, and the potential effects on downstream areas.

Permits are required from the Environment Agency to ensure that abstraction activities do not harm the environment, disrupt natural habitats, or deplete the river's water resources beyond sustainable levels.

The abstracted water would be replaced with recycled water from Mogden Sewage Treatment Works in Isleworth, transferred to the river along a new underground pipeline to an outfall structure upstream of Teddington Weir.

This way, we'd be able to access additional supplies of water from the river, while ensuring river levels are maintained and the river environment and ecology protected.

When would it be used?

There would be rules governing when the project could be used.

We'd only use it during periods of prolonged dry weather, typically between late summer and late autumn, on an intermittent basis.

In order to keep the treatment facility in good working order at other times, we'd need to run water through it, at a low volume, called a "sweetening flow".

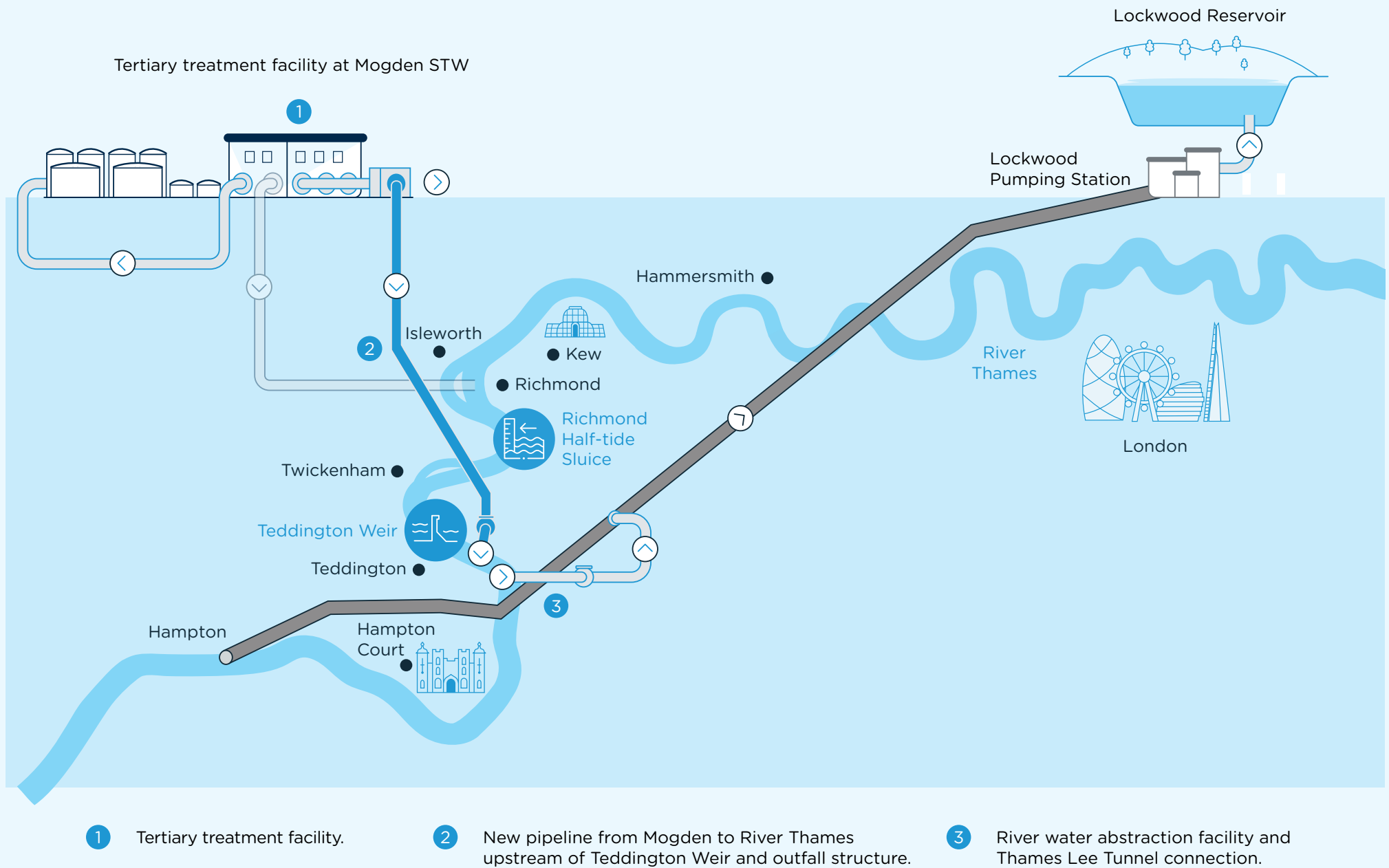
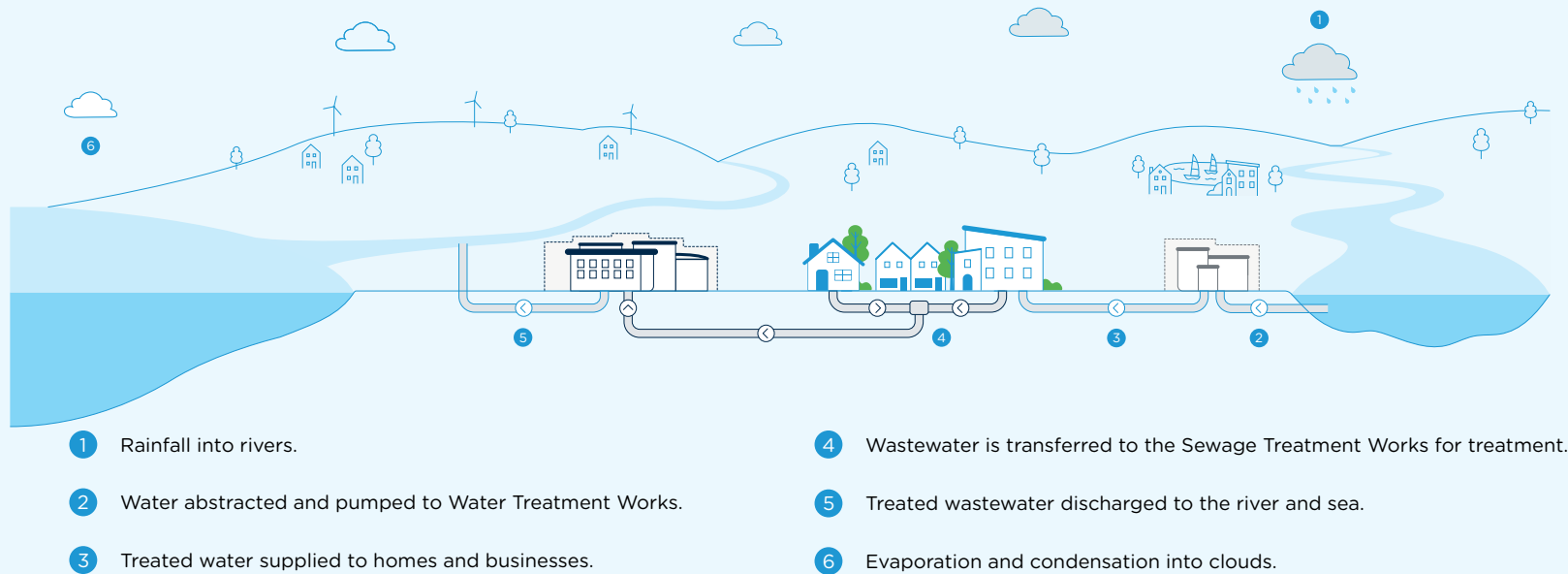


Diagram showing the key features of the Teddington DRA project

Water recycling

At the heart of this project is the use of water recycling, a tried-and-tested method used widely in the UK and other countries, particularly those with low rainfall.



Rainwater flows into our lakes, rivers and streams, as well as being absorbed into the ground. We abstract water from rivers and groundwater sources, and treat it in our water treatment works to turn it into top-quality drinking water. We pump that to your taps via our network of 20,000 miles of water pipes.

Once water's been used, we call it wastewater. It goes down your drain or plughole into our network of sewer pipes. These lead to our sewage treatment works, where we treat the water until it's clean enough to go back into the rivers.





Developing our proposals

Building on early work to establish the feasibility of the project, we've been carrying out evaluations of potential locations for the new structures that we think would be required.

Over the next three years, reflecting on feedback that we receive during our engagement and public consultations, we'll be developing designs for the proposed tertiary treatment facility, new pipelines and shafts, and intake and outfall structures.

You can find out more about these, and a public consultation we're holding on initial site options, by visiting our website at thames-sro.co.uk/TDRA

A new tertiary treatment facility

Water recycling is a key part of our Teddington DRA proposal, using a process known as tertiary treatment, which would be carried out within the site of the existing Mogden Sewage Treatment Works. We'd build a brand-new tertiary treatment facility to enable us to carry out enhanced treatment of wastewater to meet strict environmental regulations.

Then, and under permit from the Environment Agency, the recycled water could be transferred to an outfall structure on the River Thames to replace water that had been abstracted to supply our reservoirs to become drinking water.

What is tertiary treated wastewater?

Wastewater is treated so that it can be safely returned to the environment. The Environment Agency determines the level of treatment that is required and to ensure the environment is protected.

The treatment takes place at sewage treatment works, where the wastewater is filtered before undergoing primary and secondary stages of treatment to make it safe to be released into local watercourses.

At some treatment works there is a further stage, called tertiary treatment, that removes finer suspended particles, dissolved organic and inorganic substances, and additional contaminants. Discharging into the lower section of the freshwater River Thames means our treatment process to remove impurities would include as a minimum:

- Coagulant dosing, a process used in water treatment to enhance the removal of suspended particles and impurities.
- Filtration through nitrifying sand filters to reduce suspended particles and impurities.
- Filtrations through mechanical cloth filters as a final step to further remove suspended particles and impurities.

Further treatment may be required, for instance ozonation, but as we're still at an early stage we're still establishing what is needed to meet regulatory and permit requirements. Our final treatment would make sure the River Thames is clean and safe for people to use and for wildlife to thrive.

New pipelines and shafts

New pipelines would be needed to transfer water to and from the intake and outfall structures upstream of Teddington Weir.

- A new pipeline would transfer river water from an intake structure approximately 350 metres upstream of Teddington Weir to the existing Thames Lee Tunnel.
- Another pipeline, approximately 4.5km in length, would transfer recycled water from a newly built tertiary treatment facility located in Mogden Sewage Treatment Works, to an outfall structure approximately 180 metres upstream of Teddington Weir. In most places this pipeline would be between 20 and 30 metres deep and 1.8 metres wide.

Up to six shafts could be required at points along the pipeline route between Mogden Sewage Treatment Works and the outfall structure depending on the route and site options selected following public consultation. The shafts are required for access by the equipment and machinery needed for construction of the pipeline. During construction, each shaft would measure approximately 10.5m in diameter. Once construction is complete, a 2m x 2m cover for the shaft access point would remain.

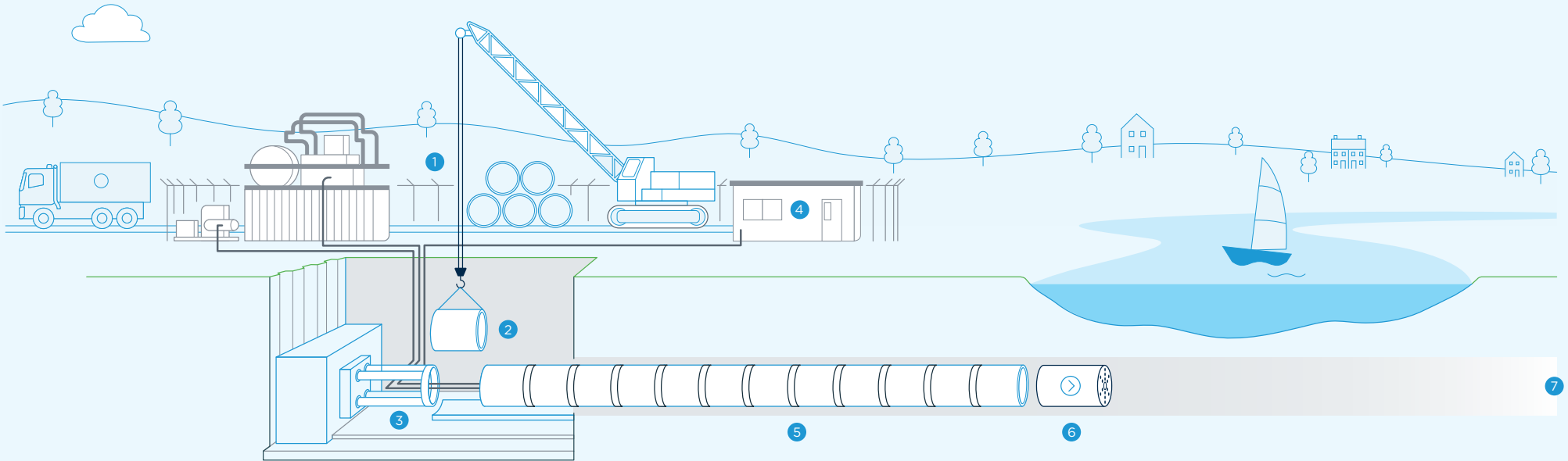
We're likely to install the pipeline using a pipe-jacking method at considerable depth (20m - 30m underground), which would minimise the risk of settlement and damage to structures on the surface.

If settlement did occur we're confident that it would be minimal. In the highly unlikely event that damages occur to property as a result of our construction we would pay for repairs.

Pipe-jacking

It is likely that the new pipelines would be created using a method called pipe-jacking. A tried-and-tested method, it involves pushing sections of pipe through the ground whilst tunnelling the ground in front. Pipe-jacking tends to create less noise and dust than other methods. Also because it takes place deep under the ground, potential impacts on existing infrastructure above ground can be avoided.

Installing pipes by pipe-jacking



- | | | | |
|---|--|---|--|
| 1 Launch shaft, material removal, pipe delivery, welfare, fenced compound. | 3 Hydraulic jacks and jacking frame. | 5 Jacking pipes with flush fitting collars. | 7 Towards reception shaft, for removal of pipe-jacking machine, welfare & fenced compound. |
| 2 Pipes lowered into shaft by crane, material removed, material handling and removal from site. | 4 Control cabin steering pipe-jacking machine. | 6 Pipe-jacking machine. | |

New intake and outfall structures

Intake and outfall structures would be built upstream of Teddington Weir, so that water could be taken from the River Thames and be replaced by recycled water.

Intake structure

The new intake structure would be built upstream of Teddington Weir. It is likely to be around 15m long and up to 4m high (above the level of the river), and consist of a platform extending around 3m into the river, with fish screens, pipes and pumps.

To build it, a temporary cofferdam (an enclosure built within a body of water to allow the enclosed area to be pumped out or drained) would be extended from the riverbank into the river to create a dry worksite.

It's expected that construction of the intake and outfall structures would take around 21 months.



An indicative image showing the intake structure upstream of Teddington Weir

Outfall structure

The outfall structure would be smaller than the intake structure, built into the riverbank at the same level as the river.

A temporary cofferdam would also be needed to build the outfall point. Once built, the surrounding land would be reinstated and diverted footpaths on the riverbank reopened.

Our plans for the project do not allow for the discharge of storm overflow during periods of heavy rainfall or untreated wastewater or sewage into the River Thames. The design will allow for only recycled water treated in the tertiary treatment facility to pass through the new pipe, and then be discharged into the River Thames via the outfall structure upstream of Teddington Weir.



An indicative image showing the outfall structure upstream of Teddington Weir

Managing impacts on the river and surrounding areas

We understand how precious the River Thames and its surroundings are. As such, **we've committed to ensuring that the Teddington Direct River Abstraction project does not cause a deterioration in the quality of the water in the river.**

We've been doing some early work to help build a detailed understanding of the river environment and surrounding areas. This will help us to assess the potential impacts of the project so we can avoid or mitigate them.

We've been carrying out surveys of the river as well as detailed modelling to understand more about its flow, and how and why it fluctuates.

We've also been carrying out surveys of a wide area of the local landscape, fauna and flora. These will continue over the next few years.

We've got lots more work to do, but our early assessments show that there is a low risk of the project causing any significant environmental impacts.

We'll continue to work closely with regulators, local authorities and local community groups as we develop our proposals. There will also be further opportunities to feedback on the project when we consult on our detailed design and preliminary impact assessments.

Environmental impact assessment

We'll carry out an environmental impact assessment to record what the environment is like now and how we predict that it might change in the future – both with and without the Teddington DRA project.

This knowledge will help us to adapt our proposals to ensure we're able to protect the river environment and surrounding areas.

We'll request an opinion from the relevant planning authorities on the scope and level of detail of the environmental impact assessment. The relevant planning authorities will provide this after consultation with technical organisations such as the Environment Agency, Natural England and local authority technical teams. Submission of the scoping request is currently planned for Spring 2024.

Public consultation on site options

We've been going through an initial process to evaluate potential sites for the new structures, pipelines and shafts that we think would be needed for the project, weighing up their relative advantages and disadvantages. In doing so we've considered things like engineering and construction feasibility, environmental impacts and the presence of existing infrastructure.

Our initial preferred sites

As a result of the site evaluation process, we've identified our initial preferred sites, which you can see on the map opposite.

It's important to note that no final decisions have yet been made – we're at an early stage in the development of our proposals and we're keen to get your feedback.

Community information events

We're holding a series of community information events in November. You can find out more about these and register to attend at **thames-sro.co.uk/events**

We're asking those who want to attend to register so that we can keep track of numbers and communicate any changes to the event arrangements. But it is not essential that you register – you'll still be able to attend.

We're holding a public consultation on initial site options.

You can find out more about the site options and our evaluation of them in our consultation documents at **thames-sro.co.uk/supportingdocuments**

You can find out more about the consultation at **thames-sro.co.uk/TDRA**

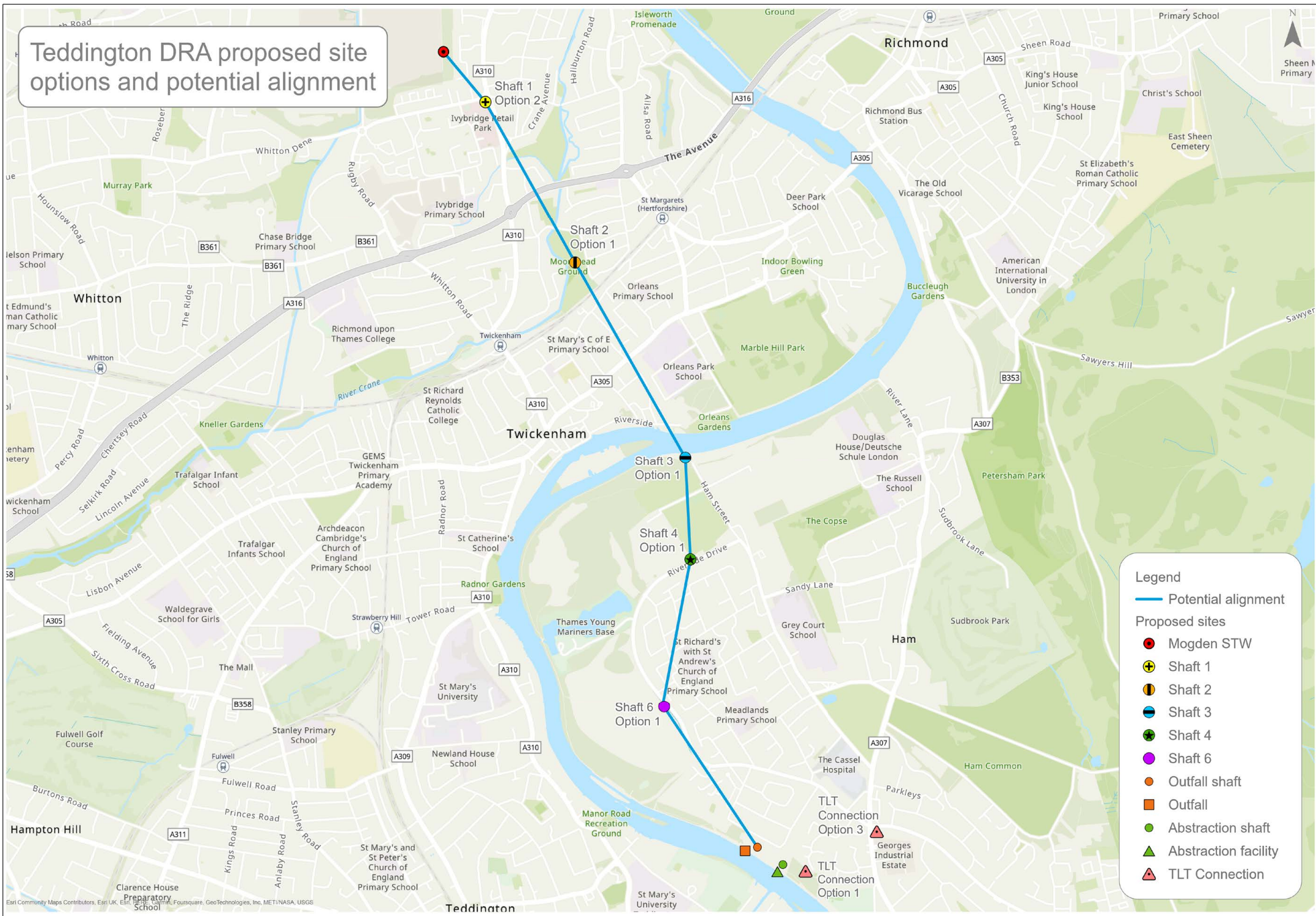
You can request copies of this booklet or any of the public consultation documents by emailing us at **info.TDRA@thameswater.co.uk** or via our Customer Helpline on **0800 316 9800**.

You can respond to the public consultation in the following ways:

- Online:
ipsos.uk/TDRA
- By email:
TDRA@ipsos.com
- By post:
FREEPOST TDRA CONSULTATION

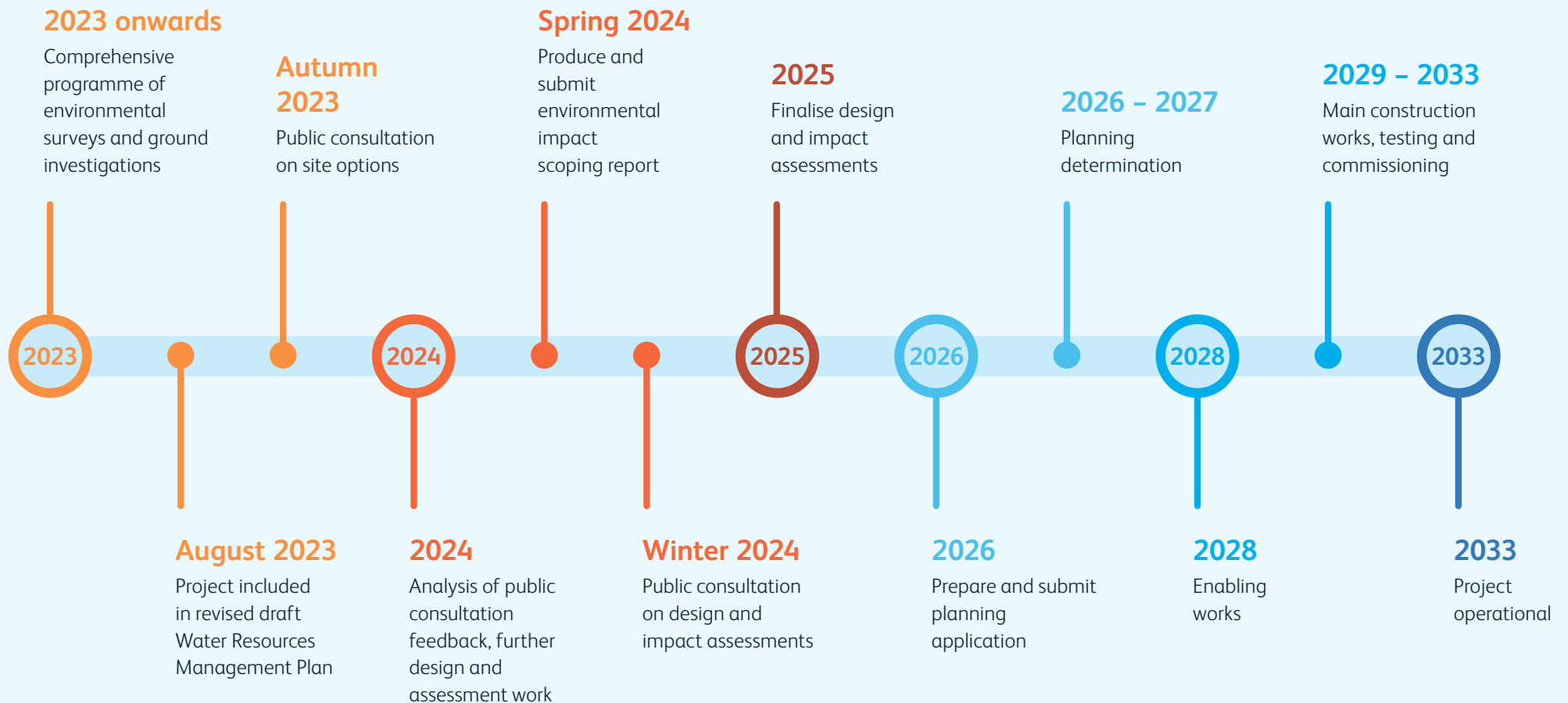


Teddington DRA proposed site options and potential alignment



Project timeline

Once the Site Options Public Consultation has closed, we'll begin the process of reading and considering all of the feedback received, to inform the next stages of design and impact assessment work.



Engagement and future public consultation

We'll carry out an extensive programme of community engagement and public consultation as we develop proposals for the Teddington Direct River Abstraction project.

- **Dedicated community engagement team** – Our dedicated community engagement team will keep local residents, businesses and river users informed and seek detailed dialogue to understand key priorities and areas of concern. This will help us address the things that matter to people.
- **Public consultation** – We're holding a public consultation on site options. We're planning a further consultation on the project design and impact assessment, which we think will take place in winter 2024-25.
- **Leaving a positive legacy** – As well as providing the vital water resources we need, the development of this project could bring wider community benefits. We want to work with stakeholders and local communities to help find out what these should be and how they should be delivered.
- **Engagement with affected landowners** – We're engaging potentially affected landowners at a very early stage, and we'll keep in close contact as we develop proposals.

Find out more

You can find out more by:

- Visiting our website at thames-sro.co.uk/TDRA
- Registering to attend one of our community information events at thames-sro.co.uk/events
- Emailing us at info.TDRA@thameswater.co.uk



