

## Gate two query process

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| Strategic solution(s) | London Water Recycling |
| Query number          | LOR008                 |
| Date sent to company  | 20/01/2023             |
| Response due by       | 23/01/2023             |

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### Query

In your response to query number LOR001 (response 24/11/22), when asked to break down Planning further, we note that in your breakdown you have included "Gate 2+ pre-planning activities". Are these related to your early Gate 3 spend requests (Thames Water Letter: 18th August 2022), and where in your submission do you take account of early Gate 3 spend in your Gate 3 forecast? Otherwise, please provide detail of activities included in "Gate 2+ pre-planning activities".

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### Solution owner response

*This response has been written in line with the requirements of the RAPID Gate 2 Guidance and to comply with the regulatory process pursuant to Thames Water's statutory duties. The information presented relates to material or data which is still in the course of completion. Should the solution presented in the Gate 2 documents be taken forward, Thames Water will be subject to the statutory duties pursuant to the necessary consenting process, including environmental assessment and consultation as required. This response should be read with those duties in mind.*

Our Gate 2+ activities were set-out in our letter to RAPID on the 12th May 2022 and acknowledged in your email response on the 17th May 2022.

The Gate 2+ activities are not related to the Gate 3 early spend referred to in Thames Water's letter dated the 18th August 2022. This Gate 3 early spend was confirmed as not forming part of the assessment of Gate 2 costs and was designed to enable an efficient use of time in setting up teams, processes and procurement across the portfolio of Thames Water SROs for Gate 3 once the Gate 2 submissions were complete.

For the avoidance of doubt, our Gate 2 expenditure, including Gate 2+ work (set-out in table 11.1 in our main Gate 2 submission and table 3.2 in Annex H: efficiency of Gate 2 expenditure) does not include any Gate 3 expenditure as

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detailed and agreed with RAPID in response to our letter on the 18<sup>th</sup> August. As requested, we have included this early Gate 3 expenditure within our wider Gate 3 forecasts presented in section 4 of Annex H.

In summary, the Gate 2+ activities were to expand the Gate 2 scope to support a short Gate 3 for schemes within the London Water Recycling SRO that were selected early in the draft regional plan. The objectives therefore formed our strategy for programme risk mitigation by ensuring no gaps in data and advancing critical pre-planning activities to allow a scheme (either Teddington DRA or Beckton Water recycling scheme) to enter the planning and procurement process early in Gate 3.

The key objectives of Gate 2+ were to:

- Maximise data collection through 2022, principally summer and autumn 2022
- Identify and address key land-based constraints and challenges that could extend the consenting programme
- Develop sufficient baseline to scope out the need for future surveys and assessment
- Develop the design to support EIA scoping early in Gate 3
- Prepare an EIA approach, methodology and scoping assessment to support EIA scoping early in Gate 3

Our Gate 2+ activities span a number of RAPID WBS's and have been included within our Gate 2 costs as shown in Annex H (section 3).

Specifically our key Gate 2+ pre-planning activities include:

### **1. Engineering**

- Development of an outline planning design with focus on development of process technology and discharge consent limits.
- Development in understanding of risk for integrating a scheme within existing Thames Water assets (e.g. TLT connection).
- Development of a specification for site investigation works
- Development of scheme delivery programmes and risk registers with contractor insight.

### **2. Environmental assessment**

- Preliminary EIA scoping of topics and identification of pathways to effect, with focus on land-based topics.
- Development of potential mitigation measures to feedback in the the design, for example additional treatment processes for the tertiary treatment plant

- Further identification of environmental constraints (land-based)

### 3. Surveys

- Targeted Phase 2 terrestrial ecology surveys including bat, badger, great crested newt and mammal surveys.
- Wintering bird surveys at designated sites
- Landscape and visual photography surveys.
- Further aquatic surveys in the Thames

### 4. Planning

- Development of a land strategy within the wider Gate 2 planning strategy and implementation of the strategy through early land referencing and compilation of documents required for a future planning application.
- Preparation of a land negotiation strategy and investigation into the applicability of using the Water Industry Act powers for a scheme
- Development of a briefing pack to establish Planning Performance Agreements with key local authorities.
- Undertaking route and site options appraisal to inform the concept design of the scheme including identifying a conveyance route corridor and infrastructure sites for EIA scoping.
- Developing a detailed consents programme with key milestones, risks and assumptions to support pre-planning activities.
- Support in development of an EIA strategy and monitoring compliance with local planning authorities plans.

If you require the copies of the correspondence from the 12th and 17th May on Gate 2+ please let us know.

We hope our response provides clarity on the query. If you require any further information, please contact the strategic solution contact below.

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| <b>Date of response to RAPID</b>                       | 23/01/2023               |
| <b>Strategic solution contact / responsible person</b> | [REDACTED]<br>[REDACTED] |