

## Gate three query process

Strategic solution(s)	London Water Recycling
Query number	LWR004
Date sent to company	02/01/2025
Response due by	09/01/2025

### Query

Can you please describe how representations on the draft decisions at gate two had been addressed at gate three or will be addressed at future gates?

### Solution owner response

*This response has been written in line with the requirements of the RAPID Gate 3 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 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.*

#### Introduction

A total of four organisations made representations to RAPID on the LWR draft decision at Gate 2. These were:

- Group Against Reservoir Development (GARD)
- Historic England
- Oxfordshire County Council
- Wantage and Grove Campaign Group

In excess of 500 representations were also made by individuals specifically about the Teddington DRA Project.

### **Summary of representations**

GARD welcomed the progression of Teddington DRA to deliver at least 67ML/d of deployable resource to the London. They believe that a much larger version of the Project should be considered making better use of the 400ML/d final effluent output from Mogden STW.

Historic England set out its desire to protect heritage assets and requested ongoing engagement with Thames Water over its SRO programmes. No specific comments were made about Teddington DRA.

Oxfordshire County Council welcomed water recycling schemes including those in London and made representation to RAPID that more schemes should be considered and only removed from further consideration if there was a highly compelling reason.

Wantage and Grove Campaign Group supported Teddington DRA as a scheme that they consider would remove the need for other Thames Water SROs.

The majority of individual representations opposed Teddington DRA raising concerns around the need for the Project and construction and operational impacts. Many suggested progressing alternative schemes within the Thames Water's SRO portfolio instead.

### **Actions through Gate 3**

Through Gate 3 engagement activities have increased regarding Teddington DRA to directly address the main themes raised by the hundreds of individual representations opposing the Project. Many of the draft representation responses were similar to the responses we received to the non-statutory public consultation on site options in autumn 2023. For this a Statement of Response was prepared and published (see [Teddington DRA Statement of Response](#)) which sets-out in section 4 our consideration, response and actions taken through Gate 3 to address the feedback received.

Our actions through Gate 3 to address representations include increasing engagement with local communities through the production of a quarterly newsletter; continued meetings with opposition groups, local authorities and MPs; and, holding four community information events about the latest design in autumn 2024.

We have also made several changes to the Teddington DRA design through Gate 3 which directly addresses a number of construction and operational concerns raised through the representation. These include:

#### Construction

- Constructing a larger diameter tunnel to reduce the need for shafts every 1,000m thereby directly removing above ground construction impacts and land-take on open space from four areas along the tunnel corridor.
- Using a tunnel boring machine which is a quicker way of building the tunnel, shorteneing any disruption caused by construction of the tunnel and allowing all tunnel excavation to be removed from Mogden rather than at each shaft site along the tunnel corridor.
- The tunnel alignment has altered slightly to reflect the change in construction technique and is now more direct and shorter to the River Thames, although the end point on land to the south of Burnell Avenue remains unchanged.

#### Operation

- To keep the infrastructure in good working order when not in use, we need to run and treat to a high standard a low volume (c. 19 Ml/d) of final effluent through the treatment process. Whereas previously it was intended that this would be discharged through the new tunnel into the River Thames, the amended design means the maintenance flow will be discharged to Isleworth Ait using the existing discharge infrastructure for Mogden STW. This means that the new Project tunnel would only be discharging to the River Thames upstream of Teddington Weir when the project is required to operate in drought conditions, forecast to be once every two years for about four months. When not operational there would be no discharge and no potential pathways to impact on ecology, water quality, health or recreational users within the lower River Thames.

#### **Actions through Gate 4**

Thames Water will continue to engage and review feedback from interested parties and investigate opportunities to further reduce any potential impacts identified as we progress with preparing a preliminary environmental impact assessment and the DCO application. We are committed to environmental protection and environmental enhancement and as we work through Gate 4 continue to refine the design and put in place mitigation and/or compensation measures wherever we identify unacceptable impacts.

If you require any further information, please contact the strategic solution contact below.

<b>Date of response to RAPID</b>	09/01/2025
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