



Annex I: Gate 3 Guidance Criteria and Signposting

J698-AA-XXXX-ZZZZ-RP-ZD-100002

Standard Gate three submission for London
Water Recycling SRO



Notice – Position Statement

This report has been produced as part of the process set out by RAPID for the development of the Strategic Resource Options (SROs). This is a regulatory gated process allowing there to be control and appropriate scrutiny on the activities that are undertaken by the water companies to investigate and develop efficient solutions on behalf of customers to meet future drought resilience challenges.

This report forms part of a suite of documents that make up the ‘Gate 3 submission’. Gate 3 of the RAPID programme represents a checkpoint on the way to solutions being prepared for consent applications. The intention at this stage is to provide RAPID with an update on activities being undertaken in preparation for consent application submission; activities’ progress including programme through to completion; and consideration of specific activities to address particular risks or issues associated with a solution. The regulatory gated process does not form part of the consenting process and will not determine whether an SRO is granted planning consent.

Given the stage of the SROs in the planning process, the information presented in the Gate 3 submission includes material or data which is still in the course of completion, pending further engagement, consultation, design development and technical / environmental assessment. Final proposals will be presented as part of consent applications in due course.

Disclaimer

This document 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 solutions presented in this document 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 document should be read with those duties in mind.

Annex I: Gate three guidance criteria and signposting

Guidance reference	Expectation	Addressed	Description and/or rationale for London Water Recycling SRO	Signpost – Annexes/ reports	Signpost – Gate 3 report sections
1. Executive summary	Provide an overview of the solution and please complete the at-a-glance table below setting out key facts, that allow comparisons with other solutions and highlight key risks at the bottom. Also outline the conclusions and recommendations for the solution.	Yes	<ul style="list-style-type: none"> Executive summary provided in Section 1 of the Gate 3 report with a 'key facts' table. Exec summary provides high level overview of the key conclusions and recommendations which are also set out in section 12 of the report 	N/A	Section 1 and 12
2. Solution design and preferred solution option	<p>Key solution design information to be developed to a standard suitable for pre-application planning consultation as per planning policy in England and/or Wales as appropriate.</p> <p>Include evidence against the standards <u>listed in section 2 of the guidance</u> where appropriate, specifically how you have:</p> <ul style="list-style-type: none"> aligned with Stage 3 of the RIBA plan of works and ACWG Design Principles considered all applicable requirements from The Network and Information Systems (NIS) Regulations 2018 and the Security and Emergency Measures (Water and Sewerage Undertakers and Water Supply Licensees) Direction 2022(SEMD). Security and Emergency Measures Direction (SEMD) requirements. <p>Standards listed in Section 2 of the guidance:</p> <ul style="list-style-type: none"> Solution design information should be developed to a standard suitable for pre-application planning consultation as per planning policy in England and/or Wales as appropriate. Solution owners should have narrowed down their solution to a firm single, potentially scalable, option including clearly defined locations as included in final regional plans and WRMPs (draft plans if final plans are not available). Solutions should be developed in line with Stage 3 of the RIBA plan of works, and ACWG Design Principles, approaching but not necessarily reaching the extent of RIBA Stage 3 outline design 	Yes	<ul style="list-style-type: none"> The option design has been developed in alignment with RIBA Stage 3 and ACWG Design Principles. Outline of the design is described in section 2 of Gate 3 Report and in the entire Annex A: CDR. Section 2 and Table 2-1 of Gate 3 Report show Gate 3 approach to the ACWG Design Principles Considerations regarding security requirements (NIS 2018 and SEMD) are presented in section 2 of Gate 3 Report and section 4.10 of Annex A: CDR Solution is developed suitable for pre-application consultation as described in section 2 of Gate 3 Report and Annex A: CDR. Statutory Consultation is planned in Q2 to Q3 2025 (section 6 in Gate 3 Report) Solution was narrowed down to a firm single option per the revised draft regional plan and the final WRMP24 as described in section 2 of Gate 3 Report (i.e. Teddington DRA). Defined locations are included as plans in section 2 of the Gate 3 Report and Annex A: CDR. Teddington DRA is in a pre-application process for a DCO application as described in section 6 of the Gate 3 Report. 	Annex A1: Conceptual Design Report (CDR)	Section 2 and 6

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	<p>for a planning or DCO application. The extent of progress made at gate three towards reaching RIBA Stage 3 design should be commensurate with achieving that level of design by the date by which the solution is timetabled to submit its planning/DCO applications. Solutions are not expected at gate three to have made planning applications, which is noted as an outcome of RIBA Stage 3, or to have made applications for DCOs. Solutions should be undertaking the pre-application stage of the NSIP process or sought pre-application planning advice from relevant local planning authorities</p> <ul style="list-style-type: none"> Solutions should have considered all applicable requirements from The Network and Information Systems (NIS) Regulations 2018 and the Security and Emergency Measures (Water and Sewerage Undertakers and Water Supply Licensees) Direction 2022(SEMD). Security and Emergency Measures Direction (SEMD) requirements. 				
2.1 Background and objectives	A very short section outlining what this solution is aiming to address, including requirements and objectives set out by the Environment Agency for England in the National Framework for Water Resources, published in 2020, and the Water Strategy for Wales.	Yes	<ul style="list-style-type: none"> The requirements and objectives of the solution in relation to the National Framework for Water Resources are stated in “Background and Objectives” in section 2 of the Gate 3 Report. Alignment with WRSE regional plan and company plans (WRMP24) is described in “Background and objectives” and “The preferred solution option” in section 2 of the Gate 3 Report. 	N/A	Section 2 “Background and Objectives” “The preferred solution option”
2.2 The preferred solution option	Design information about the preferred option for the solution and evidence justifying its selection with respect to the range of options considered in previous gates.	Yes	<ul style="list-style-type: none"> Solution description is provided in section 2 of the Gate 3 Report and Annex A: CDR entirely. Rationale and evidence for selection of the preferred solution option are in “The preferred solution option” in section 2 of the Gate 3 Report. Configuration and operation of the preferred option (Teddington DRA) is described in “Teddington DRA design development” in section 2 of the Gate 3 Report. More details are in section 1 and section 2 of Annex A: CDR. Site selection process can be found in “Site selection” in section 2 of the Gate 3 Report. Risks, constraints and how these will be addressed are discussed in “Key risks and 	Annex A1: CDR Annex A2: Cost and Carbon Report including Table 5A, 5B, 5C Annex C1: EIA Scoping Report	Section 2, 4, 6, 8



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			<p>mitigation measures” in section 6 of the Gate 3 Report and Annex A2: Costs and Carbon Report.</p> <ul style="list-style-type: none"> • Site specific design vision and principles are described in “Teddington DRA design development” in section 2 of the Gate 3 Report. • Descriptions of the key assets, drawings, maps, diagrams are in section 2 of the Gate 3 Report and in Annex A: CDR. EIA Scoping Report submitted to PINS also includes these items (Annex C). Cost data tables are in Annex A2 Cost and Carbon Report (including Table 5A, 5B, 5C). • Assumptions relating to interactions between solutions are in section 1.4 Links with other Options and Elements in Annex A: CDR. • Scalability of the option is in “Long term opportunity and scalability” in section 2 of the Gate 3 Report. Dependency and phasing are in section 1.3 and 1.4 of Annex A: CDR. • Plan and programme of Digital Twin are in “Digital Twin Strategy” in section 2 of the Gate 3 Report and in section 4.11 of Annex A: CDR. • Design review and recommendation were made by the Environment Agency for a number of items. This is summarised in "Priority Action Summary" in section 4 in the Gate 3 Report. • Solution utilisation and water resource benefits are in “Utilisation” and “Water Resource Benefits” in section 2 of the Gate 3 Report. 		
	Utilisation - Updated information on utilisation.	Yes	<ul style="list-style-type: none"> • Teddington DRA utilisation is set out in the Gate 3 report section 2. Section describes different drought scenarios and when the Project would be triggered and for what potential duration 		Section 2 “utilisation”

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	Water resource benefit - Updated information on the water resources benefit. This should be quantified to a high degree of confidence, with uncertainties explored, quantified, and mitigated where feasible. Calculations on water resources benefit should be aligned with linked solutions, regional and company water resources modelling and planning.	Yes	<ul style="list-style-type: none"> Water resource benefit section within the Gate 3 report describes the deployable output being 67MI/d on a 1:2, 1:200 and 1:500 year drought scenario. 		Section 2 “water resource benefit”
	Long term opportunities and scalability – It is important that Strategic Resource Options (SRO) explore opportunities for wider benefits.	Yes	<ul style="list-style-type: none"> Teddington DRA long term opportunities and scalability are explored in subsections of the Gate 3 report covering wider benefits solution scaling, and resilience to risk of flooding and coastal erosion. 		Section 2 “wider benefits” “solution scaling”
	Wider benefits - Information on wider benefits integrated into the solution design and proposed modes of operation and/or to be provided to third parties.	Yes	<ul style="list-style-type: none"> Teddington DRA wider benefits section included in the Gate 3 report 		Section 2 “wider benefits”
	Solution scaling - Information on the preferred proposed option for solution scaling, where applicable.	Yes	<ul style="list-style-type: none"> Teddington DRA solution scaling section included in the Gate 3 report 		Section 2 “solution scaling”
	Infrastructure resilience to the risk of flooding and coastal erosion - Information on infrastructure resilience to the risk of flooding and/or coastal erosion and on delivering wider flood risk management benefits.	Yes	<ul style="list-style-type: none"> Teddington DRA flood risk and coastal erosion information included as a subsection in the Gate 3 report 		Section 2 “Infrastructure resilience to the risk of flooding and coastal erosion”
3. Drinking water quality	Updated assessment of drinking water quality considerations and potential risks to drinking water quality and supply issues/resilience.	Yes	<ul style="list-style-type: none"> Section 3 of the Gate 3 report summarises the work undertaken on assessing drinking water quality for Teddington DRA. We have developed and updated our Gate 2 strategic water quality risk assessments following methods set out by the ACWG. Work has been shared with the DWI and comments made on the final SWQRA. Annex B includes the latest SWQRA for all three LWR schemes, while the Gate 3 report just covers Teddington DRA 	Annex B: SWQRA	Section 3

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4. Environmental	Information to show that environmental assessments of the solution are sufficiently advanced to support Development Consent Order (DCO) or local planning pre-application stages after the gate.	Yes	<ul style="list-style-type: none"> Through Gate 3 we have continued collecting baseline data and developing environmental models to support future impact assessments. This work is described in an EIA scoping report submitted to PINS for a Scoping Opinion A WFD and HRA screening has also been submitted to PINS for a Scoping Opinion Environmental work completed through Gate 3 is summarised in the Gate 3 report and supported by various annexes. The Priority actions set at Gate 2 included many environmental aspects. These have been addressed and the activities undertaken are summarised in the Gate 3 report and annex D 	Environmental Annexes C to support Gate 3 submission: Scoping Report PINS Scoping Opinion.pdf WFD screening report HRA screening report Annex D – Priority Actions Technical Notes	Section 4
Water Framework Directive assessment	Update on the assessments to ensure the solution complies with and supports the achievement of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 requirements and objectives as set out in the River Basin Management Plans.	Yes	<ul style="list-style-type: none"> A WFD screening report has been submitted for scoping opinion by PINS and is provided as evidence of WFD compliance at Gate 3 A summary is provided in the Gate 3 report confirming that Teddington DRA meets all WFD objectives. 	Annex to support Gate 3 submission Annex C2: WFD screening report	Section 4, “WFD” paragraphs 4.9 – 4.13
Habitats Regulation Assessment	Update on Habitat Regulation Assessment to represent the solution’s position within DCO or local planning pre-application stages and follow the latest Habitats Regulations Assessment (HRA) guidance. Where applicable, an outline strategy and indicative timetable for addressing HRA issues.	Yes	<ul style="list-style-type: none"> A HRA screening report has been submitted for scoping opinion by PINS and is provided as evidence of HRA compliance at Gate 3 A summary is provided in the Gate 3 report confirming that Teddington DRA with appropriate mitigation would have no impacts on site integrity of any European designated site. 	Annex to support Gate 3 submission Annex C3: HRA screening report	Section 4, “HRA” paragraph 4.14 – 4.18
Environmental Impact Assessment	Update on the statutory Environmental Impact Assessment (EIA) required to support planning and permitting applications, sufficient to show the likely scope of the EIA.	Yes	<ul style="list-style-type: none"> Through Gate 3 we have continued collecting baseline data and developing environmental models to support future impact assessments. This work is described in an EIA scoping report submitted to PINS for a Scoping Opinion 	Annex C1: Scoping Report	

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				Annex C4: PINS Scoping Opinion.pdf	
National Parks, The Broads and Areas of Outstanding Natural Beauty Environmental Impact Assessment	For solutions that may affect National Parks, The Broads or Areas of Outstanding Natural Beauty, an assessment of the likely effects on those areas, having regard to the statutory purposes for which the areas are designated. Where applicable, an outline strategy and indicative timetable for addressing issues for National Parks, The Broads or Areas of Outstanding Natural Beauty.	Yes	<ul style="list-style-type: none"> We confirm in the Gate 3 report that there are no pathways to impact National Parks or AONBs and have replaced this section with a brief on other protected areas relevant to the Project 	N/A	Section 4, paragraph 4.19 – 4.23
Other environmental considerations	Information on the following where applicable: <ul style="list-style-type: none"> Biodiversity net gain (England only) Ecosystem resilience and Wellbeing (Wales only) 	Yes	<ul style="list-style-type: none"> We have provided a section in the Gate 3 report covering 'other environmental considerations'. This section includes a summary of our BNG work through Gate 3 and our engagement with the EA as statutory planning authorities 	N/A	Section 4, "BNG" paragraph 4.24 – 4.30
Carbon	Update on carbon information following the additional guidance listed in the gate three guidance.	Yes	<ul style="list-style-type: none"> Section 5 of the Gate 3 report covers our work through Gate 3 on carbon. This summary is supported by annex A2 which includes whole life carbon cost assessment. 	Annex A2 Teddington DRA cost and Carbon report	Section 5
Assessments of the whole life carbon cost of the solution	Clear estimations of carbon costs.	Yes	<ul style="list-style-type: none"> Whole life carbon costs are presented in the Gate 3 report within table 5-1. Annex A2 provides supporting information 	Annex A2 Teddington DRA cost and Carbon report	Section 5, table 5-1
Reflecting the governance and environmental needs of Wales	Where a solution is within or affecting Wales an assessment of the carbon impact in Wales from the outset. See section 5 of the guidance.	No as N/A	<ul style="list-style-type: none"> N/A 	N/A	N/A
Project plan	A clear project-level plan that sets out the key solution-specific milestones to delivery and includes key activities and outputs that need to be undertaken and achieved prior to each subsequent gate.	Yes	<ul style="list-style-type: none"> A project plan has been developed from a detailed P6 programme that sets-out key milestones in the delivery of the Project. This plan shows how the Project will be construction ready within AMP8. Alongside the plan is a table of key programme assumptions and dependencies 	Annex G: Planning, Lands, and Delivery Programme	Section 6, "project plan" paragraph 6.5 – 6.11 and

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			<ul style="list-style-type: none"> A summary project plan is included in the Gate 3 report and supporting information in annex G 		Table 6-1, figure 6-1 and 6-2
Key risks and mitigation measures	An assessment of key risks to the solution's planned progress to completion (including requirements at gates) and an assessment of risks to costs and realisation of the benefits of the solution.	Yes	<ul style="list-style-type: none"> Key risks and mitigations are summarised in the Gate 3 report and cover overarching key risks, planning and land risks and procurement risk in the relevant sections of the report. These risks are embedded within quarterly dashboards submitted to RAPID through 2023 and 2024. 	N/A	<p>Section 6, Table 6-2 for overarching key risks.</p> <p>Paragraph 6.46-6.50 for planning and land specific risks</p> <p>Table 7-3 for procurement specific risks</p>
Proposed gate four activities and outcomes	Propose dates for gate four onwards aligned with the solution project plan.	Yes	<ul style="list-style-type: none"> We envisage Gate 4 to be in September 2026 with the forecasts and project plan based on this date. We have set-out a list of activities and outcomes for Gate 4 The project plan is supported by further information in annex G 	Annex G: Planning, Lands, and Delivery Programme	<p>Section 6, 11 Plan and dates - Figure 6-1</p> <p>Paragraph 11.9</p> <p>Activities - Table 6-3</p> <p>Outcomes - Paragraph 6.14</p>
Planning and land	Updated land and planning strategy for the solution.	Yes	<ul style="list-style-type: none"> We have developed a planning and land strategy and these have been implemented through 2023 and 2024. The Gate 3 report summarises work completed to date and further information is provided in annex G 	Annex G: Planning, Lands, and Delivery Programme	<p>Section 6 paragraph 6.15 – 6.25 sets out the strategy</p> <p>Paragraph 6.30 to 6.46 sets out the implementation</p>

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Procurement and operation model	Updated procurement arrangements and updated procurement strategy.	Yes	<ul style="list-style-type: none"> In the Gate 3 report we set out the preferred procurement procedure, including explaining about the timing of incoming new regulations and how that has been considered. At paragraph 7.10, we set out how the commercial strategy has been developed and the current progress of this activity. The history and outcomes of market engagement to date is set out at paragraph 7.21 and its influence can be seen throughout the chapter. Paragraph 7.29 sets out the detailed procurement timetable to achieve the outcomes set out in the chapter. We explain at paragraph 7.31 the measures we have taken to increase our ability to maximise the competition for this procurement. Paragraph 7.35 explains the identified risks and issues that need to be considered and mitigated during the procurement activity. 	N/A	Section 7
Solution costs and benefits	Updated key cost information for the preferred option with reduced uncertainty in costs and benefits and an explanation of any material change in costs, including where optimism bias has been reduced as costs firm up. See section 8 of the guidance.	Yes	<ul style="list-style-type: none"> Table 8-1 in section 8 of the Gate 3 report summarises the latest project costs for Teddington DRA. We set out in section 8 key assumptions and exclusions for the presentation of costs. The Gate 3 report is supported by annex A2 which provides further details of key cost changes since Gate 2 and updated costed risk and optimism bias. 	Annex A2, section 3 covers costing methodology for the updated costs. Section 7 covers the journey from Gate 2 to Gate 3	Section 8, including table 8-1 and 8-2
Best value and solution benefits	Updated best value and solution benefits. See section 8.1 of the guidance.	Yes	<ul style="list-style-type: none"> The Gate 3 submission provides an overarching summary confirming Teddington DRA remains best value and is our preferred scheme to achieve 1 in 200 year drought resilience. This aligns with WRSE's draft regional plan and our published WRMP. 	Annex A2, section 8	Section 2 – paragraph 2.11-2.14 Section 8 paragraph 8.15-8.16
Stakeholder and customer engagement	Information to show that solutions have completed non-statutory consultation and are undertaking statutory pre-planning consultation for DCO solutions, or planning application and permission. A description of the stakeholder concerns that have been raised in representations to date (including representations on	Yes	<ul style="list-style-type: none"> The Gate 3 report sets out the engagement and consultation work undertaken for Teddington DRA through Gate 3. This includes completing non-statutory consultation on site options and engagement through design information events taken forward to EIA scoping. Documents prepared for these events are provided as annexes to the Gate 3 submission. 	Annex E: Brochure 2023 Brochure 2024	Section 9

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	the draft decisions at the previous gate) and how they have been addressed at gate three or will be addressed at future gates. See section 9 of the guidance.		<ul style="list-style-type: none"> Annex F provides our Statement of Responses to the 2023 public consultation. Engagement has been multifaceted with a range of stakeholders are regular intervals through Gate 3. This is set out in the Gate 3 report in section 9. Further Project specific customer research has also been undertaken through Gate 3, with two-thirds of those contacted in support of the Project. 	Annex F: Statement of Response	
Board statement and assurance	An assurance statement from the Board of each solution owner, in its own words.	Yes	<ul style="list-style-type: none"> The Gate 3 submission is supported by a covering letter and assurance statement which supports the progression of the solution through to Gate 4. Three-line assurance processes has been undertaken for the submission with key deliverables subject to independent review. 	Covering letter for the Gate 3 submission	Section 10
Efficiency of expenditure	Information in the Efficiency of Expenditure template detailing incurred costs for each gate activity allocated to the categories of Programme and Project Management; Finalised Feasibility and Developed Design; Environmental Assessment; Data Collection, Sampling, and Pilot Trials; Planning and Land; Commercial and Procurement; Stakeholder Engagement; Legal, and Other.	Yes	<ul style="list-style-type: none"> The Gate 3 report summarises expenditure per WBD and per project within the SRO through the gate which totals c£22.6m resulting in c£7m underspend of the cumulative allowance. Annex H provides further breakdown and explanation of expenditure including the RAPID expenditure table template. Where items exceed £0.5m this has been split further and a more detailed explanation provided. 	Annex H Annex H – table 3.3, 3.4, 3.5 includes the RAPID templated table showing cost breakdown per WBS per project	Section 11
Early gate four spend	Information on any gate four activities and the associated expenditure that has taken place during the gate three period.	Yes	<ul style="list-style-type: none"> We wrote to RAPID in October 2024 setting out the requirement for early Gate 4 spend with onboarding a Technical Partner team to deliver Teddington DRA through planning and procurement from Gate 3 onwards. RAPID responded in October confirmed this spend as appropriate. This information is summarised in the Gate 3 report and communications between Thames Water and RAPID 		Section 11 “early Gate 4 spend”
Solution progression	Recommendations for which solution(s) and option(s) should progress through gate three and continue to receive funding for their investigation and development.	Yes	<ul style="list-style-type: none"> We have made recommendations on the basis of scheme progression. For Teddington DRA we expect full progression through to Gate 4 in September 2026 following a DCO application in July 2026. 	Annex G: Planning, Lands, and Delivery Programme	Section 11 “solution progression”

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			<ul style="list-style-type: none"> For Mogden and Beckton we recommend both schemes continue to the end of AMP7 upon which a preferred alternative scheme would progress into AMP 8 and the list of activities reviewed on an annual basis through checkpoint calls with RAPID. 		
12. Conclusions and recommendations	<p>Concise summary of the conclusions. Recommendations from the sponsors on:</p> <ul style="list-style-type: none"> Whether the solution should progress to gate four. Approaches to resolving any major risks or barriers to scheme progression and application for a DCO or local planning application. 	Yes	<ul style="list-style-type: none"> The Gate 3 report provides a set of conclusions and recommendations in Section 12. We have confirmed that we have complied with the Gate 3 guidance through our assurance progress and the board endorses the Gate 3 submission for ongoing progression of Teddington DRA through planning and procurement. 		Section 12
13. Supporting documentation	<p>Any data tables including cost and benefit profiles must be consistent with 2024 water resource management plans (WRMP24) reporting requirements.</p> <p>In the gate three report include:</p> <ul style="list-style-type: none"> A table of any actions and recommendations given by RAPID at the previous gate and signpost where further detail can be found in the report and/or appendix. Table listing each appendix of the submission, its title and a summary of content. Gate three submission template 12 In the appendix to the report include: An appendix that lists the criteria from the gate three guidance and signposting where in the report or which appendix of the report it is addressed. An example from a gate two appendix has been included as a guide on the next page 	Yes	<ul style="list-style-type: none"> We have provided the following supporting documentation to the Gate 3 submission: List of annexes as set out in this signposting document – table 13-1 Signposting table of Gate 2 actions and recommendations – table 13-2 	<p>WRMP cost tables captured in Annex A2</p> <p>RAPID spend profile tables captured in Annex H</p> <p>Signposting Annex I – this report</p>	<p>Section 4 “priority action summary”</p> <p>Section 13, table 13-2</p>



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