



Rapid Gate 1 submission Annex B3

May 2021

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Thames to Affinity Transfer Strategic Resource Option - Water Framework Directive Assessment

Rapid Gate 1 submission Annex B3

May 2021

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1 Introduction

1.1 Overview

This annex supports the Environment Assessment Report (EAR) that accompanies the Gate 1 submission to Regulators' Alliance for Progressing Infrastructure Development (RAPID) for the Thames to Affinity Transfer (T2AT) Strategic Regional Option (SRO). The annex presents the findings of a Water Framework Directive (WFD) assessment applied to the T2AT options

The content of this report is draft and relates to material [or data] which is still in the course of completion in travel to Gate 2 and should not be relied upon at this early stage of development. We continue to develop our thinking and our approach to the issues raised in the document in preparation for Gate 2

1.2 T2AT Options

The outputs of the initial route options appraisal identified seven distinct options for transferring water from the Thames Water (TW) region to the Affinity Water (AFW) region. An eighth option, Mogden Reuse Indirect 3, is identical in terms of environmental assessment to Walton 2b and so has not been assessed separately. Throughout this report, the assessment applied to the Walton 2b option applies equally to Mogden Reuse Indirect 3. These options are shown in Table 1.1. Further details on the options are set out in Section 2: Scheme Description.

Table 1.1: T2AT Options

Option name	Description overview
Sunnymeads 1	Abstraction of raw water at the and conveyance to a new Water Treatment Works (WTW) at the existing will be utilised for this option
Maidenhead	Abstraction of raw water at a new intake, conveyance to a new WTW at and utilisation of available storage capacity at the existing
Teddington Direct River Abstraction (DRA)	Abstraction of raw water at a new intake at, conveyance to a new WTW at, and utilisation of the available storage capacity at the existing
Sunnymeads 2a	Abstraction of raw water at the and conveyance to a new WTW at 2), near to the existing WTW. The potable water is then conveyed to the existing.
Walton 2b (and Mogden Reuse Indirect 3)	Abstraction of raw water at the and conveyance to new 2 WTW The potable water is then conveyed to the existing
Lower Thames Reservoir Transfer 2a	Water from is abstracted via a proposed connection into Affinity Water's existing at the existing at the existing 2 WTW The potable water is subsequently conveyed to the existing 2
Beckton Reuse Indirect	Indirect transfer of reuse water from to a new WTW near The proposed abstraction point would be located on the ,

1.3 Methodology

1 3 1 Approach to WFD assessment for SROs

The WFD requires all waterbodies (both surface and groundwater) to achieve 'good status'. The Directive also requires that the waterbodies experience no deterioration in status. Good status is a function of good ecological status (biological, physico chemical and hydromorphological

elements and specific pollutants) and good chemical status (Priority Substances and Priority Hazardous Substances).

The All Company Working Group (ACWG) has developed a consistent framework for undertaking WFD assessments for SROs to demonstrate that options will not cause deterioration in status of any WFD waterbodies. The assessment considers mitigation that would need to be put in place to protect waterbody status. The assessment also considers WFD future objectives

Two stages of assessment are completed under the ACWG WFD approach, an initial Level 1 basic screening and a Level 2 detailed impact screening. These are conducted/reported using a spreadsheet assessment tool which is automated based on option information for Level 1 and expert judgment based for Level 2. Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020

1.3.2 Level 1 – basic screening

The first stage of WFD assessment was completed by Water Resources South East (WRSE) in January 2021 for all WRSE options Level 1 assessment follows these steps:

- Identify affected waterbodies;
- Review SRO options;
- Identify possible impacts;
- Apply 'embedded' mitigation measures; and
- Calculate screening score (using a 6-point scale) to 'screen out' waterbodies and options with no or very minor potential impacts from further assessment.

The outcomes for T2AT options are summarised in Section 3 and Appendix A. Where waterbodies and option impacts were 'screened in', they have been taken forward to Level 2 assessment.

1.3.3 Level 2 – detailed impact screening

The second stage of WFD assessment has been completed for T2AT SRO options that were screened in at Level 1, following the steps:

- Waterbody scale detailed assessment of impacts to each WFD quality element for each activity proposed as part of an SRO option;
- Assessment of data confidence level and design certainty confidence levels are assigned
 for each assessment, based on the quality and availability of both physical data and design
 information about the option at the time of assessment (note, confidence/certainty expected
 to be low at initial Gate 1 assessment and increase over time). Where the confidence levels
 are medium or low, the requirements for further data or design information in order to raise
 this confidence level for future gates will be listed;
- Identification of further mitigation needs;
- Assessment of impacts after mitigation (scoring on a 6-point scale); and
- Identification of activities to improve certainty of assessment outcomes.

The outcomes of the Level 2 assessments are summarised in Section 4 and Appendix B.

1 3 4 Limitations and assumptions

As the project is still in the early stages of design development a precautionary approach has been exercised because of residual uncertainty
The WFD assessment has the following limitations and assumptions:

- The ACWG approach uses WFD 2015 data, as it is the current officially reported baseline in the 2015-2021 Cycle 2 RBMP. The RBMPs are anticipated to be updated in 2021, and 2019 WFD baseline data released in late 2020 would then become the new baseline. To make sure of consistency, the 2015 data has been used at Gate 1, but acknowledge that this will need to be updated to the 2019 status as soon as the RBMPs are published (proposed for Gate 2)
- Assessment assumes pipelines are underground (directionally drilled or pipe jacked beneath any watercourses) and therefore will not cross watercourses above ground or cause direct impacts.
- This assessment has only considered the impacts associated directly with the T2AT SRO
 options at this stage, and does not include the impacts of inter-reliant source water SROs
 such as South East Strategic Reservoir Option (SESRO) and London Reuse SRO
- The geographical extent of the WFD assessment has been limited to the waterbodies where
 abstractions take place. There is potential for some effects continuing downstream of the
 abstraction point, although it is assumed these would become increasingly limited to
 'negligible' with distance. This assumption will need to be reviewed as additional hydrological
 studies are undertaken.

1 3 5 WFD for Gate 2 and beyond

Where waterbodies and option impacts have been identified, recommendations have been made for increasing the confidence in the assessment. This is expected to be through increasing the level of detail available during later stages of option development for subsequent gateways if the relevant options are progressed. In combination assessments where different SRO option delivery is interdependent would also be required. Recommendations are included in Section 5.2

2 Scheme description

2.1 Overview

The T2AT scheme is a prospective project with the objective of abstracting available raw water from the Thames Water catchment in west, south, and east London; treating it to potable water standards; and delivering to Affinity Water customers in the area to the north and north east of London Potential sources of raw water are the River Thames (supported by the SESRO and/or the Severn Thames Transfer (STT) schemes) and reuse options within the London Reuse SRO scheme. Treated water would be delivered to an existing distribution hub, either the existing or a new SR near

A full scheme description can be found in the Gate 1 submission report to RAPID, however a summary of the main aspects of the options are included below.

2.2 Option descriptions

For Gate 1, there are seven distinct options for T2AT as described in Table 2.1 A map of the options is shown in Figure 2.1.

Table 2.1: T2AT Gate 1 options

Option name	Option description
Sunnymeads 1	Abstraction of raw water at the new WTW at the existing will be utilised for this option 50Ml/d and 100Ml/d options Interdependencies of the option with SESRO or STT Downstream network enhancement
	Indicative intake location: Intake selection by option: Conventional screens.
Sunnymeads 2a	Abstraction of raw water at the and conveyance to a new WTW at [2], near to the existing WTW. The potable water is then conveyed to the existing 50Ml/d and 100Ml/d options. Interdependencies of the option with SESRO or STT. Downstream network enhancement.
	Indicative intake location:
	Intake selection by option: Conventional screens.
Maidenhead	Abstraction of raw water at a new intake, conveyance to a new WTW at many and utilisation of available storage capacity at the existing storage sound options. Interdependencies of the option with SESRO or STT. Downstream network enhancement. Indicative intake location: Intake selection by option: Passive wedge wire screen intake within the river and a gravity pipe to an offset pumping station
Teddington DRA	Abstraction of raw water at a new intake at and utilisation of the available storage capacity at the existing 50Ml/d and 100Ml/d options Interdependencies of the option with London Reuse SRO Teddington DRA option Downstream network enhancement Indicative intake location: Intake selection by option: Passive wedge wire screen intake within the river and a gravity pipe to an offset pumping station.
Walton 2b (and Mogden Reuse Indirect 3)	Abstraction of raw water at the existing and conveyance to new 2 WTW. The potable water is then conveyed to the existing 50MI/d and 100MI/d options. Interdependencies of the option with SESRO or STT. Downstream network enhancement.
	interaction of the option with occitor of or 1. Downstroam notation of interiorist.

Option description Option name Another option, referred to as 'Mogden Reuse Indirect 3' comprises the same infrastructure as Walton 2b, but utilises water from the proposed London Reuse SRO (Mogden Reuse option) The environmental assessments for the alternative sources are covered by the source SROs; SESRO and STT for Walton 2b and London Effluent Reuse SRO for the Mogden Reuse Indirect 3 option. In this report, wherever Walton 2b is mentioned as an option, the associated narrative applies equally to the Mogden Reuse Indirect 3 option. Indicative intake location: Intake selection by option: Conventional screens Lower Thames Water from is abstracted via a proposed connection into Reservoir Transfer at the existing . This raw water is then diverted to the proposed 2 WTW. The potable water is 2a SR 50MI/d and 100MI/d options subsequently conveyed to the existing Interdependencies of the option with SESRO Downstream network enhancement Indicative intake location: Connection into existing Intake selection by option: Proposed , with supplementary works on the to enable Thames Water to compensate for lost abstraction at Beckton Reuse Indirect transfer of reuse water from to a new WTW near Indirect . The proposed abstraction point would be located on the downstream of the outfall from the proposed Beckton Reuse option of the London Effluent Reuse SRO. 50MI/d and 100MI/d options. Another potential source for this option is water abstracted as part of the London Reuse SRO Teddington DRA option, which abstracts river water upstream of the effluent discharge from and utilises the which discharged in a similar location to the proposed Beckton Reuse Scheme Interdependencies of the option with the London Reuse SRO or London Reuse SRO Teddington DRA option extension within the London Reuse SRO Downstream network enhancement. Indicative intake location Intake selection by option: 1 Passive wedge wire screen and gravity pipe to a pumping station or 2 A channel to an offset conventional screen and pumping station



2.3 Updates to the scheme since WRSE undertook their review

The WRSE assessment was undertaken on an early iteration of the options Further changes have been made to the options since these were assessed by WRSE in order to optimise the options and to minimise the impact on the environment.

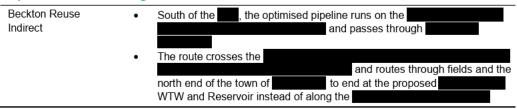
An overview of the changes made to the routes are presented in Table 2.2 No significant changes were made to the routes assessed by WRSE.

As a result of the optimisation of the options, the location of some of the pipeline crossings have changed. However, while some locations have changed, it does not change the list of WFD waterbodies reviewed as part of the level 1 screening. Therefore, the findings from the WRSE level 1 screening assessment remain valid.

Table 2 2: Overview of the changes made to the options since WRSE assessment

Option name	Changes since WRSE assessment
Sunnymeads 1	 Optimised route limits the number of crossings of the motorway and adjacent A-roads – as a result of this the total pipeline length was reduced (near the proposed 2 WTW) Pipeline carefully routed closer to field boundaries between the proposed 2 and the existing to minimise the impact on land. The route south of the was amended for a slightly longer route which crosses the railway track and requires an additional river crossing. While this resulted in a small increase in pipe length, this change in the route means that it no longer routes through the town of
Maidenhead	 A longer section of the optimised route goes through the Avoid an area of Grade 2 land (
Teddington DRA	 First part of the route has been modified as a result of the change in the proposed abstraction location. This results in a slight increase in the length of the pipeline, and a short section of the optimised route running along. Sports Ground. Short sections of the route located between Uxbridge and the A40 have been amended to follow the roads where possible. Section of the route between also be optimised to follow the roads more closely. Section of the route between South and the existing SR has moved to the south east therefore no longer adjacent to some ancient woodland.
Sunnymeads 2a	The option follows largely the same route as Sunnymeads 1 The only difference between the routes is that this option diverges east from Sunnymeads 1 near the proposed 2 WTW for treatment before joining back. Refer to 'Sunnymeads 1' for the changes made to the route.
Walton 2b	South of the optimised route would follow the While the route would need to cross the at that point, the optimised route avoids landfills sites, priority habitats, golf course and green spaces. The optimised route also results in fewer motorway crossings • As the optimised route intercepts the Sunnymeads 1 route to the proposed 2 WTW and then follows the same route to the existing SR, refer to 'Sunnymeads 1' for the changes made to that section of the Walton 2b route
Lower Thames Reservoir Transfer 2a	As the option conveys water from the proposed 2 WTW and from there follows the same route as the Sunnymeads 1 option, refer to 'Sunnymeads 1' for the changes made to that section of the Lower Thames Reservoir transfer 2a route.

Option name Changes since WRSE assessment





3 WRSE Water Framework Directive findings (Level 1 WFD)

3.1 Sunnymeads 1

The WRSE Stage 1 WFD assessment covered four components of the option. The outcomes indicated no further assessment would be necessary for the option, because the types of activities do not present a risk to WFD status or objectives for any waterbodies Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020

Table 3 1: WRSE WFD Level 1 assessment outcomes for Sunnymeads 1 option

WRSE Option ID	AFW_AZ4_HI-TFR_SWX_CNO_Sunnymeads_1_conv100
Option Description	Sunnymeads 1 100Ml/d option. Abstraction of water at an expanded treatment works and then conveyed to the
Number of waterbodies passing WFD assessment	8
Waterbodies passing WFD	GB106039023231: Thames (Cookham to Egham)
assessment	GB106039023520: Datchet Common Brook
	GB106039023040: Horton Brook
	GB106039023010: Colne Brook
	GB106039023080: Alderbourne
	GB106039023090: Colne (Confluence with Chess to River Thames)
	GB106039023070: Pinn
	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
Sunnymeads 1 50MI/d	
WRSE Option ID	AFW_AZ4_HI TFR_SWX_CNO Sunnymeads_1_conv50
Option Description	Sunnymeads 1 50Ml/d option. Abstraction of water at expanded treatment works and then conveyed to the
Number of waterbodies passing WFD assessment	8
Waterbodies passing WFD	GB106039023231: Thames (Cookham to Egham)
assessment	GB106039023520: Datchet Common Brook
	GB106039023040: Horton Brook
	GB106039023010: Colne Brook
	GB106039023080: Alderbourne
	GB106039023090: Colne (Confluence with Chess to River Thames)
	GB106039023070: Pinn GB106039023090: Colne (Confluence with Chess to River Thames)
Normalism of contamb adian was civing	
Number of waterbodies requiring further WFD assessment	0
New WTW 50MI/d Phase 1	
WRSE Option ID	AFW AZ4 HI-ROC WT1 CNO wtw
Option Description	New WTW 50MI/d Phase 1
Number of waterbodies passing WFD assessment	1

Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
New WTW 50MI/d Phase 2	2
WRSE Option ID	AFW AZ4 HI-ROC WT2 ALL wtw 50p2
Option Description	New WTW 50MI/d Phase 2
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.2 Sunnymeads 2a

The WRSE Stage 1 WFD assessment covered six components of the option. The outcomes indicated no further assessment would be necessary for the option, because the types of activities do not present a risk to WFD status or objectives for any waterbodies. Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020

Table 3.2: WRSE WFD Level 1 assessment outcomes for Sunnymeads 2a option

Sunnymeads 2a 100MI/d	
WRSE Option ID	AFW_AZ4_HI TFR_SWX_CNO Sunnymeads2a_conv100
Option Description	Sunnymeads 2a 100Ml/d option. Abstraction of water at a new 2 treatment works site and then conveyed to the
Number of waterbodies passing WFD assessment	8
Waterbodies passing WFD	GB106039023231: Thames (Cookham to Egham)
assessment	GB106039023520: Datchet Common Brook
	GB106039023040: Horton Brook
	GB106039023010: Colne Brook
	GB106039023080: Alderbourne
	GB106039023090: Colne (Confluence with Chess to River Thames)
	GB106039023070: Pinn
	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
Sunnymeads 2a 50MI/d	
WRSE Option ID	AFW_AZ4_HI-TFR_SWX_CNO Sunnymeads2a_conv50
Option Description	Sunnymeads 2a 50Ml/d option Abstraction of water at new 2 treatment works site and then conveyed to the
Number of waterbodies passing WFD assessment	8
Waterbodies passing WFD	GB106039023231: Thames (Cookham to Egham)
assessment	GB106039023520: Datchet Common Brook
	GB106039023040: Horton Brook
	GB106039023010: Colne Brook
	GB106039023080: Alderbourne
	GB106039023090: Colne (Confluence with Chess to River Thames)
	GB106039023070: Pinn
	GB106039023090: Colne (Confluence with Chess to River Thames)

Number of waterbodies requiring	0
further WFD assessment New 2 WTW 50MI/d Phase 1	
WRSE Option ID	AFW AZ4 HI-ROC WT1 CNO 2 wtw
· · · · · · · · · · · · · · · · · · ·	
Option Description	New 2 WTW 50MI/d Phase 1
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
New 2 WTW 50MI/d Phase 2	
WRSE Option ID	AFW_AZ4_HI-ROC WT2_ALL2_wtw_50p2
Option Description	New 2 WTW 50MI/d Phase 2
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
to 100MI/d	
WRSE Option ID	AFW_AZ4_HI TFR_AZ4 CNO conv100
Option Description	100MI/d
Number of waterbodies passing WFD assessment	2
Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
to 50MI/d	
WRSE Option ID	AFW AZ4 HI-TFR AZ4 CNO conv50
Option Description	50MI/d
Number of waterbodies passing WFD assessment	2
Waterbodies passing WFD	GB106039023010: Colne Brook
assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.3 Maidenhead

The WRSE Stage 1 WFD assessment covered four components of the option Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020.

The outcomes indicated a Level 2 assessment would be required for both the 100Ml/d and 50Ml/d proposed intake and abstraction elements of the option on the 'Thames (Reading to Cookham)' WFD waterbody (ID GB106039023233), because the abstraction related activities presented some risk to WFD status or objectives to this waterbody

Table 3.3: WRSE WFD Level 1 assessment outcomes for Maidenhead option

Maidenhead 100MI/d

WRSE Option ID	AFW_AZ4_HI TFR SWX_CNO Maidenhead_conv100
Option Description	Maidenhead 100MI/d option. Abstraction of raw water at to
Number of waterbodies passing WFD assessment	4
Waterbodies passing WFD assessment	GB106039023880: Wye (High Wycombe fire station to Thames) GB106039023080: Alderbourne
	GB106039029830: Misbourne
	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	1
Waterbodies requiring further WFD assessment	GB106039023233: Thames (Reading to Cookham)
Maidenhead 50MI/d	
WRSE Option ID	AFW_AZ4_HI TFR SWX_CNO_Maidenhead_conv50
Option Description	50Ml/d option. Abstraction of raw water at to
Number of waterbodies passing WFD assessment	4
Waterbodies passing WFD assessment	GB106039023880: Wye (High Wycombe fire station to Thames) GB106039023080: Alderbourne GB106039029830: Misbourne GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	1
Waterbodies requiring further WFD assessment	GB106039023233: Thames (Reading to Cookham)
New WTW 50MI/d Phase	
WRSE Option ID	AFW AZ4 HI-ROC WT1 CNO wtw
Option Description	New WTW 50MI/d Phase 1
Number of waterbodies passing WFD assessment	
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
New WTW Phase	2
WRSE Option ID	AFW AZ4 HI-ROC WT2 ALL wtw 50p2
Option Description	New WTW 50MI/d Phase 2
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.4 Teddington DRA

The WRSE Stage 1 WFD assessment covered four components of the option. Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020.

The outcomes indicated a Level 2 assessment would be required for both the 100Ml/d and 50Ml/d proposed piped routes (from proposed piped routes (from proposed piped routes)) elements of the option, on the THAMES UPPER (transitional waterbody) WFD waterbody (ID GB530603911403), because the abstraction related activities presented some risk to WFD status or objectives to this waterbody.

Table 3.4: WRSE WFD Level 1 assessment outcomes for Teddington DRA option

WRSE Option ID	AFW AZ4 HI-TFR LON CNO tedd dra conv100		
Option Description	Teddington DRA 100Ml/d option. Piped route from the to a new WTW and then to the existing (Raw water is abstracted from the Thames and replaced by effluent from Mogden as part of the Teddington DRA option within London Effluent Reuse SRO).		
Number of waterbodies passing WFD assessment	3		
Waterbodies passing WFD assessment	GB106039023030: Crane GB106039023070: Pinn GB106039023090: Colne (Confluence with Chess to River Thames)		
Number of waterbodies requiring further WFD assessment	1		
Waterbodies requiring further WFD assessment	GB106039023232: Thames (Egham to Teddington)		
Teddington DRA 50MI/d			
WRSE Option ID	AFW AZ4 HI-TFR LON CNO tedd dra conv50		
Option Description	Teddington DRA 50MI/d option Piped route from the DRA abstraction point at to a new WTW and then to the existing (Raw water is abstracted from the Thames and replaced by effluent from Mogden as part of the Teddington DRA option within London Effluent Reuse SRO)		
Number of waterbodies passing WFD assessment	3		
Waterbodies passing WFD assessment	GB106039023030: Crane GB106039023070: Pinn GB106039023090: Colne (Confluence with Chess to River Thames)		
Number of waterbodies requiring further WFD assessment	1		
Waterbodies requiring further WFD assessment	GB106039023232: Thames (Egham to Teddington)		
New WTW 50MI/d Phase 1			
WRSE Option ID	AFW_AZ4_HI ROC WT1 CNO wtw		
Option Description	New WTW 50MI/d Phase 1		
Number of waterbodies passing WFD assessment	1		
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)		
Number of waterbodies requiring further WFD assessment	0		
New WTW 50MI/d Phase 2			
WRSE Option ID	AFW AZ4 HI-ROC WT2 ALL wtw 50p2		
Option Description	New WTW 50MI/d Phase 2		

Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.5 Walton 2b

The WRSE Stage 1 WFD assessment covered six components of the option Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020

The outcomes indicated a Level 2 assessment would be required for both the proposed 100Ml/d and 50Ml/d Walton abstraction elements of the option on the 'Thames (Egham to Teddington)' WFD waterbody (ID GB106039023232), because the abstraction related activities presented some risk to WFD status or objectives to this waterbody.

Table 3.5: WRSE WFD Level 1 assessment outcomes for 2b option

AFW_AZ4_HI-TFR_LON_CNO_Walton_conv100				
Walton 2b 100Ml/d option. Abstraction of raw water at 2 treatment works and then to				
7				
GB106039017060: The Moat at Egham				
GB106039017070: Chertsey Bourne (Virginia Water to Chertsey)				
GB106039023231: Thames (Cookham to Egham)				
GB106039023090: Colne (Confluence with Chess to River Thames)				
GB106039023010: Colne Brook				
GB106039023080: Alderbourne				
GB106039023070: Pinn				
1				
GB106039023232: Thames (Egham to Teddington)				
AFW AZ4 HI-TFR LON CNO conv50				
Walton 2b 50Ml/d option. Abstraction of raw water at 2 treatment works and then to				
7				
GB106039017060: The Moat at Egham				
GB106039017070: Chertsey Bourne (Virginia Water to Chertsey)				
GB106039023231: Thames (Cookham to Egham)				
GB106039023090: Colne (Confluence with Chess to River Thames)				
GB106039023010: Colne Brook				
GB106039023080: Alderbourne				
GB106039023070: Pinn				
1				
OD400000000000 Th (F -h t- T- ddit)				
GB106039023232: Thames (Egham to Teddington);				
GB106039023232: Thames (Egnam to Teddington);				

Option Description	New 2 WTW 50MI/d Phase 1
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
New 2 WTW 50MI/d Phase 2	
WRSE Option ID	AFW AZ4 HI-ROC WT2 ALL 2 wtw 50p2
Option Description	New 2 WTW 50MI/d Phase 2
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
to 100MI/d	
WRSE Option ID	AFW AZ4 HI-TFR AZ4 CNO conv100
Option Description	to 100MI/d
Number of waterbodies passing WFD assessment	2
Waterbodies passing WFD assessment	GB106039023010: Colne Brook; GB106039023090: Colne (Confluence with Chess to River Thames);
Number of waterbodies requiring further WFD assessment	0
to 50MI/d	
WRSE Option ID	AFW_AZ4_HI TFR_AZ4_CNO conv50
Option Description	to 50MI/d
Number of waterbodies passing WFD assessment	2
Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.6 Lower Thames Reservoir Transfer 2a

The WRSE Stage 1 WFD assessment covered six components of the option. The outcomes indicated no further assessment would be necessary for the option, because the types of activities do not present a risk to WFD status or objectives for any waterbodies. Further information on WFD classification and the approach adopted can be found in *ACWG*, *WFD*: Consistent framework for undertaking no deterioration assessments, Nov 2020

Table 3.6: WRSE WFD Level 1 assessment outcomes for Lower Thames Reservoir Transfer 2a option

Lower Thames Reservoir Transfer 2a 100MI/d							
WRSE Option ID AFW AZ4 HI-TFR SWX CNO ltr 2a conv100							
Option Description	Lower Thames Reservoir Transfer 2a 100Ml/d option Transfer direct from to treatment works at and then to						
Number of waterbodies passing WFD assessment	4						

Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames) GB106039023070: Pinn GB106039023080: Alderbourne
Number of waterbodies requiring further WFD assessment	0
Lower Thames Reservoir Transfer	2a 50MI/d
WRSE Option ID	AFW_AZ4_HI TFR_SWX_CNO ltr 2a_conv50
Option Description	Lower Thames Reservoir Transfer 2a 50Ml/d option. Transfer direct from Thames owned reservoir to treatment works at SR
Number of waterbodies passing WFD assessment	4
Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames) GB106039023070: Pinn GB106039023080: Alderbourne
Number of waterbodies requiring further WFD assessment	0
New 2 WTW 50MI/d Phase 1	
WRSE Option ID	AFW AZ4 HI-ROC WT1 CNO 2 wtw
Option Description	New 2 WTW 50MI/d Phase 1
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
New 2 WTW 50MI/d Phase 2	
WRSE Option ID	AFW_AZ4_HI-ROC WT2_ALL2_wtw_50p2
Option Description	New 2 WTW 50MI/d Phase 2
Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
to 100MI/d	
WRSE Option ID	AFW_AZ4_HI TFR_AZ4 CNOto_hfld_conv100
Option Description	to 100MI/d
Number of waterbodies passing WFD assessment	2
Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0
to 50MI/d	
WRSE Option ID	AFW AZ4 HI-TFR AZ4 CNO conv50
Option Description	to 50Ml/d
Number of waterbodies passing WFD assessment	2

Waterbodies passing WFD assessment	GB106039023010: Colne Brook GB106039023090: Colne (Confluence with Chess to River Thames)
Number of waterbodies requiring further WFD assessment	0

3.7 Beckton Reuse Indirect

The WRSE Stage 1 WFD assessment covered four components of the option. The outcomes indicated no further assessment would be necessary for the option, because the types of activities do not present a risk to WFD status or objectives for any waterbodies. Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020.

Table 3.7: WRSE WFD Level 1 assessment outcomes for Beckton Reuse Indirect option

Beckton Reuse Indirect 100MI/d				
WRSE Option ID	AFW AZ3 HI-TFR LON CNO beckton conv100			
Option Description	Indirect transfer of Beckton reuse water from Treatment works (New site) to the Beckton 100Ml/d option			
Number of waterbodies passing WFD assessment	4			
Waterbodies passing WFD assessment	GB106039029850: Colne (upper east arm including Mimshall Brook) GB106038033180: Turkey Brook and Cuffley Brook GB106038033200: Small River Lee (and tributaries) GB106038027950: Lea Navigation Enfield Lock to Tottenham Locks			
Number of waterbodies requiring further WFD assessment	0			
Beckton Reuse Indirect 50MI/d				
WRSE Option ID	AFW AZ3 HI-TFR LON CNO beckton conv50			
Option Description	Indirect transfer of Beckton reuse water from Treatment works (New site) to the Beckton 50Ml/d option.			
Number of waterbodies passing WFD assessment	4			
Waterbodies passing WFD assessment	GB106039029850: Colne (upper east arm including Mimshall Brook) GB106038033180: Turkey Brook and Cuffley Brook GB106038033200: Small River Lee (and tributaries) GB106038077851: Lea Navigation (Fieldes Weir to Enfield Lock)			
Number of waterbodies requiring further WFD assessment	0			
New WTW 50MI/d Ph	ase 1			
WRSE Option ID	AFW_AZ3_HI ROC WT1 CNO wtw			
Option Description	New WTW 50Ml/d Phase 1			
Number of waterbodies passing WFD assessment	1			
Waterbodies passing WFD assessment	GB106039029850: Colne (upper east arm including Mimshall Brook)			
Number of waterbodies requiring further WFD assessment	0			
New WTW 50MI/d Ph	ase 2			
WRSE Option ID	AFW AZ3 HI-ROC WT2 ALL wtw 50p2			
Option Description	New WTW 50MI/d Phase 2			

Number of waterbodies passing WFD assessment	1
Waterbodies passing WFD assessment	GB106039029850: Colne (upper east arm including Mimshall Brook)
Number of waterbodies requiring further WFD assessment	0

The Level 1 WFD assessment completed for Gate 1 by WRSE indicated that a number of options are anticipated to have very low risks of being non compliant with WFD objectives, and do not require further assessment:

- Sunnymeads 1
- Sunnymeads 2a
- Lower Thames Reservoir Transfer 2a
- Beckton Reuse Indirect

The Level 1 WFD assessment identified the need to undertake Level 2 WFD assessments for the below options, due to the potential for some WFD effects related to new abstraction infrastructure or the operation of abstraction directly from the waterbody:

- Maidenhead
- Teddington DRA
- Walton 2b

4 Level 2 Water Framework Directive assessments

The second stage of WFD assessment has been completed for T2AT SRO options that were screened in at Level 1. Further information on WFD classification and the approach adopted can be found in ACWG, WFD: Consistent framework for undertaking no deterioration assessments, Nov 2020.

Section Error! Reference source not found. to Section 4.3 provide an overview of the Level 2 WFD assessments undertaken for Maidenhead, Teddington DRA and Walton 2b Section 4.4 provides a summary table for each option assessed.

4.1 Maidenhead

The Level 2 WFD assessment identified possible deterioration risks to fish, invertebrates, hydrological regime, dissolved oxygen and phosphate. These are primarily due to a potential risk of reduced flow due to increased abstraction, and the additional intake structure required. It also identified potential impediments to meeting Good Ecological Status, if the hydrological regime of the waterbody was affected to the extent that phosphate concentrations could increase, as this element is currently below good. A summary of the Level 2 WFD assessment is included in Table 4 1 and detailed outputs are presented in Appendix B

4.2 Teddington DRA

The Level 2 WFD assessment identified possible deterioration risks to fish, macrophytes and phytobenthos, hydrological regime, dissolved oxygen and phosphate. These are primarily due to the potential for reduced flow due to increased abstraction and the additional intake structure required, although it is noted that the impacts may be spatially limited when considered at the scale of the waterbody given the location at the downstream extent/boundary. It also identified potential impediments to meeting Good Ecological Status, as the hydrological regime of the waterbody does not support good status, due in part to changes in natural flow of the waterbody attributed to water industry activities. A summary of the Level 2 WFD assessment is included in Table 4.2 and detailed outputs are presented in Appendix B.

4.3 Waton 2b

The Level 2 WFD assessment identified possible deterioration risks to fish, macrophytes and phytobenthos, hydrological regime, dissolved oxygen and phosphate. These are primarily due to the potential for reduced flow due to increased abstraction. It also identified potential impediments to meeting Good Ecological Status, as the hydrological regime of the waterbody does not support good status, due in part to changes in natural flow of the waterbody attributed to water industry activities. A summary of the Level 2 WFD assessment is included in Table 4.3 and detailed outputs are presented in Appendix B

4.4 Summary tables

Summary tables of the Level 2 WFD outcomes are provided below and detailed outputs are presented in Appendix B.

Table 4.1: Maidenhead (50Ml/d and 100Ml/d options) Level 2 WFD summary

Waterbody ID	Waterbody Name	Confidence in WFD data	Confidence in option design	Requirements to improve confidence	Mitigation measures	Deterioration between status classes	Compromises water body objectives	Assists attainment of water body objectives	Further comments
GB106039023233	Thames (Reading to Cookham)	Low	Moderate	Detailed review of all baseline ecological WFD data, including results of any surveys already undertaken for T2AT and other prospective schemes (e.g. macrophyte and fish surveys). Detailed hydrological assessment of the impacts of 50 or 100Ml/d abstractions on water quality / concentration of key physicochemical parameters. Further information about option.	Fish and eel screening at new intake. Abstraction conditions to be set to minimise changes to hydrological regime that could cause deterioration of biological and physicochemical WFD elements.	Possible	Possible	No	100Ml/d option potentially higher risk if hydrological change more pronounced due to greater abstracted volume. T2AT SRO assumes additional source water within Thames Water catchment which can be transferred into Affinity Water catchment. If this is the case, the hydrological effects identified at this stage may be precautionary.

Table 4.2: Teddington DRA (50MI/d and 100MI/d options) Level 2 WFD summary

Waterbody ID	Waterbody Name	Confidence in WFD data	Confidence in option design	Requirements to improve confidence	Mitigation measures	Deterioration between status classes	Compromises water body objectives	Assists attainment of water body objectives	Further comments
GB106039023232	Thames (Egham to Teddington)	Low	Moderate	Detailed review of all baseline ecological WFD data, including results of any surveys already undertaken for T2AT and other prospective schemes (e.g. macrophyte and fish surveys). Detailed hydrological assessment of the impacts of 50 or 100Ml/d abstractions on water quality / concentration of key physicochemical parameters. Further information about options.	Fish and eel screening at new intake. Abstraction conditions to be set to minimise changes to hydrological regime that could cause deterioration of biological and physicochemical WFD elements.	Possible	Possible	No	100Ml/d option potentially higher risk if hydrological change more pronounced due to greater abstracted volume. Option relies on delivery of London Reuse SRO The effects of the London Reuse SRO have not been assessed in this WFD stage.

Table 4.3: Walton 2b (50Ml/d and 100Ml/d options) Level 2 WFD summary

Waterbody ID	Waterbody Name	Confidence in WFD data	Confidence in option design	Requirements to improve confidence	Mitigation measures	Deterioration between status classes	Compromises water body objectives	Assists attainment of water body objectives	Further comments
GB106039023232	Thames (Egham to Teddington)	Low	Moderate	Detailed review of all baseline ecological WFD data, including results of any surveys already undertaken for T2AT and other prospective schemes (e.g. macrophyte and fish surveys). Detailed hydrological assessment of the impacts of 50 or 100Ml/d abstractions on water quality / concentration of key physicochemical parameters. Further information about options.	Fish and eel screening at new intake. Abstraction conditions to be set to minimise changes to hydrological regime that could cause deterioration of biological and physicochemical WFD elements.	Possible	Possible	No	100Ml/d option potentially higher risk if hydrological change more pronounced due to greater abstracted volume. T2AT SRO assumes additional source water within Thames Water catchment which can be transferred into Affinity Water catchment. If this is the case, the hydrological effects identified at this stage may be precautionary.

5 Conclusions

5.1 Summary

For the T2AT scheme, seven distinct options have been subject to a WFD assessment.

The Level 1 WFD assessment completed for Gate 1 by WRSE indicated that a number of options are anticipated to have very low risks of being non-compliant with WFD objectives, and do not require further assessment:

- Sunnymeads 1
- Sunnymeads 2a
- Lower Thames Reservoir Transfer 2a
- Beckton Reuse Indirect

Level 2 WFD assessments were completed for components of the below options:

- Maidenhead
- Teddington DRA
- Walton 2b

The findings indicate that there are precautionary WFD compliance risks associated primarily with the operation of either 50Ml/d or 100Ml/d additional/new abstractions (see summary provided in Section 4.4). The potential hydrological effects could conflict with achieving WFD status objectives. This is particularly the case where hydrology/river flow is an existing limiting factor, recorded in WFD baseline data as a 'reason for not achieving good'. The potential biological effects, particularly on fish, and physico-chemical changes (for example, reduced dilution) would require further assessment to improve certainty of the scale of effects as outlined in Section 5.2.

For new or modified intakes, it is recognised that appropriate fish and eel screening would be required to prevent entrainment. At Gate 1, this has been considered as likely mitigation, but moderate/amber risks have been maintained until option designs and assessments are further progressed.

5.2 Further assessment

Subject to their progression through the approvals process, further WFD assessment would be required for the following options, to improve the certainty of the levels of WFD risk outlined in the Gate 1 WFD Level 2 assessments:

- Maidenhead
- Teddington DRA
- Walton 2b

Areas for future focus include:

- Consultation with the Environment Agency to present and discuss key WFD risks and proposed approach to improving certainty of assessments;
- Collation and review of Heavily Modified Waterbody (HMWB) measures information from the Environment Agency for inclusion into the assessment of potential impediment to obtaining Good Ecological Potential (GEP);

- Collation and review of detailed baseline data concerning WFD biological, physicochemical
 and hydromorphological elements identified as being at yellow, amber, or red risk in the
 Level 2 assessments. This may include existing Environment Agency and Thames Water
 long term WFD and water quality monitoring data within the relevant waterbodies, and
 targeted baseline surveys being undertaken specifically for the SRO assessments;
- Hydrological / water balance assessment of the scale of change for either 50Ml/d or 100Ml/d abstractions on the River Thames in relation to gauged flows;
- Development of a conceptual model linking together how potential hydrological changes could influence water quality and the sensitivity of aquatic communities to those changes. This will include a diagrammatic/visual presentation of linkages between abstraction impacts and the direct and indirect effects on physico-chemical and biological WFD status elements, indicating thresholds of WFD classes or tolerance to change. This step would aid consultation and discussion with stakeholders and the requirement for/scoping of any detailed modelling:
- Further information on the design and operation of the options;
- Assessment of the combined potential WFD effects/risks of inter-reliant multiple options (where T2AT is reliant on other SROs being delivered);
- Update to Level 2 WFD assessments to incorporate additional information;
- Outlining further work or modelling required to demonstrate compliance into Gate 3.

It is noted that there may be potential changes to WFD-related legislation related to Britain's exit from the European Union (EU) The EU WFD legislation is transposed in England and Wales by *The Water Environment (WFD) (England and Wales) Regulations 2017*[†]. The Cycle 3 River Basin Management Plans (RBMPs) are also due to be published in 2021, which may bring about changes in the baseline status and objectives for waterbodies. Where necessary, changes will need to be accounted for in updates to the WFD assessments at each Gate stage.

¹ https://www.legislation.gov.uk/uksi/2017/407/made

A. WRSE output tables

The WRSE WFD outputs are available on the



B. Further assessment output tables



