

River Thames Scheme

Non-Statutory Consultation Response

On behalf of **the Project Group**



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1 Introduction

1.1 Purpose of document

- 1.1.1 This document sets out the Project Group's (Surrey County Council, Runnymede Borough Council, Spelthorne Borough Council and Elmbridge Borough Council) response to the River Thames Scheme (RTS) Non-Statutory Consultation (8 November 2022 - 20th December 2022). The Project Group are the Host Authorities for the RTS, as they are Council's in which the development is situated. The RTS is an infrastructure project of national significance and will be consented through a Development Consent Order (DCO). As part of this process, the Applicant (Surrey County Council and the Environment Agency (EA)) is undertaking a Non-Statutory Consultation, hereafter referred to as the Consultation, to inform stakeholders of the proposed scheme.

1.2 Scheme Overview

- 1.2.1 The RTS proposes an integrated scheme comprising of three parts: flood alleviation, community spaces and habitat creation areas.
1. Flood Alleviation – Creation of a new river channel in two sections through Runnymede and Spelthorne, totalling over 8.5km. These will act as new flow routes for excess water when water levels in the River Thames rise too high. Downstream of Desborough Cut, the river bed will be lowered. Additionally, improvements will be made to the Sunbury, Molesey, and Teddington weirs, to include installing more gates that can be opened when river levels rise.
 2. Community Spaces – Proposed opportunities to create recreational spaces for the community. This is expected to include new foot and cycle paths and play and picnic areas. There will also be new ways to access the river and take part in activities such as fishing, canoeing, and boating.
 3. Habitat creation areas – the scheme also proposes to improve and create high quality natural habitats (also known as habitat creation areas) to increase biodiversity This will help to preserve and encourage wildlife in the area.
- 1.2.2 Each element of the RTS is proposed to work together to deliver benefits for communities and the environment. The RTS proposes to reduce the risk of flooding to the surrounding homes, businesses, and infrastructure, provide habitats for wildlife and a new landscape feature, increase access to green open spaces and sustainable travel routes, drive inclusive economic growth, and enhance biodiversity.
- 1.2.3 The RTS will be the first flood and climate mitigation project which is described as nationally significant.

1.3 Need for the Scheme

- 1.3.1 The River Thames between Egham and Teddington runs through the largest area of populated but undefended floodplain in England. In addition to the towns and villages in this area, the landscape has been heavily shaped by major infrastructure and extensive mineral workings. This has resulted in an area in which many homes and businesses are at risk of flooding. The River Thames has a long history of flooding, in 2014, over 900 homes flooded, with major impacts on families, roads and supply of services. With climate change, the risk of flooding is growing. The proposed new flood channel will aim to reduce the risk of flooding to homes, businesses, and infrastructure.
- 1.3.2 The stretch of the River Thames between Egham and Teddington has lots of potential to provide economic, health and environmental benefits to the community. However, flood risk, lack of

access to open space areas, and poor-quality natural habitats mean that it is currently unable to fulfil this potential.

History of the Scheme

- 1.3.3 In 2009, a consultation on the Lower Thames Risk Management Strategy was held by the EA. This strategy was agreed in 2011 with a recommendation for the RTS.
- 1.3.4 Planning and design commenced in 2014 and the first public consultation was held in 2016. The 2016 consultation concentrated on what routes the (then) three proposed channel sections would take, and how the River Thames could be altered to increase water capacity and flow. Since the 2016 consultation, the proposed three channels have been reduced to two channels due to lack of funding.
- 1.3.5 In December 2020, The Government declared that the RTS is a project of national significance and therefore it requires a DCO.
- 1.3.6 In June 2021, Defra and HM Treasury approved the outline business case, comprising details of the scheme, approach, and budget.

2 Approach to Consultation

- 2.1.1 The RTS has progressed further since the 2016 consultation. It now incorporates design elements to reduce flood risk and aims to create better access routes to enhance exercise and recreational opportunities for the public. In addition, it intends to create a better habitat network and drive sustainable, inclusive economic growth.
- 2.1.2 This Consultation aims to gather opinions from the general public, landowners, local authorities, community groups and environmental and regulatory organisations, on the proposals for the RTS.
- 2.1.3 The Consultation aims to gain an understanding on opinions regarding the proposal to lower the riverbed downstream of the Desborough Cut, the provision of a more sustainable travel network, better access to open green spaces, and improved connections to wildlife and habitat quality. In addition, the consultation intends to develop insight into what is required for inclusive economic growth, and how to ensure the construction process prioritises sustainability.
- 2.1.4 The Consultation is a hybrid consultation, incorporating online and in person events. The Project Group has the following comments regarding the approach to consultation:
- Consultation content – The Consultation consists of high-level information lacking in detail on the proposed design of amenity features and any potential environmental impacts. There is also a lack of clarity on the details of the scheme proposed and no clear position on matters such as the proposed landscape strategy and if the beacons/ mounds that were proposed in the previous consultation, will still form part of this proposed scheme. These are key elements of the scheme where community engagement and involvement of the host authorities would be required, yet this Consultation does not appear to deal or address this. It is understood that further information will follow as part of a series of technical workshops with statutory stakeholders and, and the Project Group look forward to having an active role in these, and a Statutory Consultation will be held toward the end of 2023.
 - Online information – The online consultation events were well organised and engaging. The Project Group were issued a Consultation brochure, however, consultation information online is presented in a series of web pages. The web pages are slightly difficult to navigate through. Downloadable documents would have made for easier reading for stakeholders.
 - Consultation events – The Project Group understand that the Applicant is in the early stages of design and more information will be given in due course, however, details on landscape/habitat creation areas would have been useful to review and comment on at the early stages of design.
 - In-person events – The in-person consultation events were well organised, and stakeholders were given further information when requested. It may have been prudent to not have an in-person event on the launch of the Consultation (8 November 2022). Hosting an in-person event after the launch date allows stakeholders to digest the consultation information and attend consultation events better informed to ask questions. Furthermore, whilst it is recognised that the scheme extends over a large area, locals only have the opportunity for one in-person event per town. For example, the two in-person events within the Borough of Runnymede are in Egham on a Tuesday or Chertsey on a Wednesday. None in the Borough are during the weekend and none are in areas such as Thorpe which is also affected by the proposal.
 - Online consultation events – Some of the online events were fully booked, which may have been a deterrent to stakeholders to request attendance. This was fed back to the Applicant and further dates were added to the programme of online consultation events. It is also

noted that in order to attend a virtual event you have to sign up via an email which is not very user friendly

- 2.1.5 Once this Consultation stage is completed, there will be further consultation proposed for late 2023. This will be specifically related to the proposed design of the scheme. There is a concern that much of the design work that will be on-going throughout 2023 will be presented as a *fait accompli* at the following consultation (late 2023) and therefore the Project Group is engaged with at early stage, before design work advances.

3 Response to Non-Statutory Consultation Brochure

3.1 Integrated scheme/Scheme Description

- 3.1.1 The RTS will run from Egham to Teddington. As part of this, the RTS proposes a new river channel comprising two sections: the Runnymede channel section and the Spelthorne channel section. When water levels rise too high, these channel sections will provide new flow routes for the excess water. The channel route will go through existing lakes and watercourse, enabling it to blend in with the existing landscape.
- 3.1.2 The information provided within the Consultation brochure does not contain any detail or drawings to understand how the elements of the RTS; new channel, active travel routes and links to communities, recreational areas and habitat creation areas are sensitivity designed to integrate into the existing landscape. Further information is sought.

3.2 Changes to the River Thames Scheme / Alternative Schemes

Chapter 2 of the Consultation brochure, 'Considered so far', provides different options that were considered as part of the RTS. However, there is no information on alternative route options or how alternatives were assessed. An alternatives assessment will be required as part of the Environmental Impact Assessment (EIA) process:

- 3.2.1 *"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."* The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Schedule 4 (2)
- 3.2.2 Comments are provided below on the alternative options provided within the Consultation brochure as part of the RTS:
- Datchet to Hythe End Channel section - Originally, there were three channel sections incorporated into RTS. The third channel section was proposed to run from Datchet to Hythe end. However, insufficient funding meant that this was too costly to deliver, and therefore removed from the scheme. Has the RTS been altered further to accommodate the removal of the Datchet to Hythe End Channel section? Further information needs to be submitted regarding the impact of the removal of the RBWM part of the channel on the areas of Englefield Green and Thorpe.
 - Desborough Cut - It is understood that following the 2016 consultation there was strong opposition not to widen Desborough Cut and lowering of the Desborough Cut was rejected on the grounds of environmental impacts, costs, impacts on traffic, maintenance and health and safety concerns. The Consultation brochure highlights that environmental impacts would be less downstream of Desborough Cut than Desborough Cut itself, but no further information is provided to confirm this.
 - Local flood defences - where flood defences are provided for the RTS, these should take into consideration the locality of the area and be sensitively designed to integrate into the existing environment.

4 Response to Non-Statutory Consultation Brochure - Review of Environmental Considerations

4.1 Introduction

- 4.1.1 The information provided within the Consultation is high-level and lacks detail on potential environmental impacts. This chapter therefore highlights information that the Project Group requires further engagement on, expects to see at the next round of consultation, and provides a response to the Consultation brochure.

4.2 Flood Risk and Water Quality

Flooding

- 4.2.1 The Consultation brochure makes several references to the flood alleviation benefits associated with the RTS, and the modelling used as a basis for this statement. However, the modelling referred to is not provided as part of the Consultation and it remains unclear how the flood zones would change as a result of the construction of the RTS proposals. Therefore, the 'with' and 'without' scenario modelling is sought.
- 4.2.2 This modelling would aid the review of Runnymede's 2030 Local Plan which commenced in January 2021. Over the next year, Runnymede need to understand what the difference is likely to be to the flood zones in Runnymede. This will help Runnymede Council plan for future growth in the Borough in the next iteration of the Local Plan which will plan up to at least 2040. Additionally, the Planning Policy team at Runnymede Council attends quarterly meetings with the Residents Associations whereby a number of the groups expressed concern and frustration that the RTS 'with' and 'without' scheme models had not been made available to the public, making it difficult for them to understand the benefits of the scheme, and to draw conclusions as to whether the improvements to flood risk will be realised. It would be helpful to understand when this modelling will be available to both the Project Group and the public. The Project Group also seek confirmation as to whether the modelling has been updated to account for the new definition of the functional floodplain as published in the Planning Practice Guidance (August 2022).

The importance of the floodplain

- 4.2.3 Connecting the floodplain helps to store water and reduce flooding downstream and will help to reconnect areas of open floodplain that can be used as storage. Having open floodplains allows infiltration to occur which also acts as storage, and therefore it is important not to use impermeable materials when designing the leisure, recreation and community uses of the floodplain. The RTS should not reduce the floodplain capacity.
- 4.2.4 The Consultation provides a high-level overview of the flood risk benefits of the scheme summarising both its goal of reducing flood risk to the area and ensuring no increased risk to upstream and downstream communities. Further information would be needed, as the scheme progresses, to review these goals.

Water Quality

- 4.2.5 Monitoring of the water quality throughout the scheme area will help to prevent deterioration and will show any benefits; as long as monitoring is continued throughout construction and post construction. There is a potential risk of pollution to the groundwater from contaminated land, therefore monitoring of the groundwater quality throughout the construction phase is vital to

prevent any deterioration of groundwater quality. For example, if a pollution sample is recorded, work should be stopped to control the contamination and prevent future pollution.

- 4.2.6 The constant supply of water to the reach will allow flow variation and different sediment processes to occur within the channel; which will help control fine sediment distribution through the scheme. Therefore, it is necessary to ensure that the non-flood water levels are high enough to maintain a flow through the scheme and prevent stagnation of water to occur.

Groundwater Quality

- 4.2.7 Within the Consultation brochure, it is described that monitoring of rivers, lakes and groundwater within the RTS has been undertaken over the last decade, and the information will be used to limit impacts, where possible. It is considered that an objective of the scheme should be to improve water quality, not just limit the impacts of the scheme on water quality. Further information should be provided regarding the nature of the monitoring that has been undertaken, what the information shows, and how this will be used and assessed as part of the scheme development. Information regarding the proposed monitoring and validation of the potential impacts on groundwater and surface water quality should be provided. Open water swimming in the Thames is noted within the Consultation brochure as a potential benefit of the scheme, water quality should be considered from a health perspective.

Local Flood Defences

- 4.2.8 New localised flood defences will be utilised, where required, in the form of raised embankments, walls, small barriers in ditches or individual property protection. Local flood defences should be sensitively designed in keeping with the local environment.

4.3 Materials and Waste

- 4.3.1 The Project Group welcomes the Applicant's commitment to embedding the Waste Hierarchy within the design of the RTS. However, within the Materials Management section (page 36) it outlines the process of reduce, reuse, recycle, but does not provide details of the lifecycle of potential materials utilised in the scheme and other finer details associated with materials use and management. Further engagement is sought on the material re-use strategy.
- 4.3.2 Surrey benefits from a full set of up-to-date minerals and waste development plan documents and supplementary plan documents. The Minerals and Waste Planning Authority (MWPA) is currently preparing the County's first joint minerals and waste local plan which will seek to provide for a minerals and waste development framework for a period of 15 years (2024-2039). Appropriate consideration should be given to emerging minerals and waste policy during scheme development and the DCO process.

4.4 Ground Contamination

Ground Investigations

- 4.4.1 Ground investigation and associated geochemical and gas data should be shared with the Project Group, given the jurisdiction of the Council's over land contamination matters under both Part 2A of the Environmental Protection Act 1990 and within the planning process.

Land Contamination

- 4.4.2 The Consultation brochure is generally lacking in any detail regarding the potential for impacts on human health, controlled waters and the environment, from potentially contaminated soils/materials.

- 4.4.3 There is no mention of agricultural land, designated sites or minerals in the Consultation brochure. Information regarding the consideration of, and assessment of, impacts to these aspects is required.
- 4.4.4 The Project Group has concerns about the proposed channel going through landfill sites. There is no specific information in the Consultation brochure as to which landfills would be impacted and how the Applicant will protect the rest of the landfill, the water channel and the environment. In the Consultation brochure, it is indicated that a barrier will be designed for incorporation into the new channel sections, to prevent contamination from the landfills getting into the channel. However, where the excavated landfill material is intended for re-use within the scheme, assessment of the risks to human health and livestock is required and should be undertaken and provided. It is acknowledged that there is a degree of risk in going through the landfill, but the Consultation contains no information on what is happening to that material. Future information is required to understand the potential impacts the re-use of material will have on the environment and end users.
- 4.4.5 There is no discussion regarding landfill/ground gas in the Consultation brochure. Information regarding the current ground gas regime, how this will change, and the potential impacts of this is required.
- 4.4.6 The Consultation brochure states that there will be opportunities for recreational community space such as foot paths, cycle paths, play and picnic areas. There will be a requirement to ensure that soils are suitable for the intended end use in accordance with relevant best practice guidance. In some areas remediation may be required to achieve geochemically suitable soil for the intended end use. If there is the intention of any agricultural use such as grazing of animals, then that land end use would need to be considered.
- 4.4.7 The methods of assessing excavated waste material for suitability for re-use (geochemically and geotechnically) should be provided. The Consultation brochure does not mention geohazards or land stability and details of how these aspects are being considered and assessed is required.
- 4.4.8 There is no reference within the Consultation brochure of the process for any mineral that is encountered as part of the scheme. Would minerals be extracted prior to works commencing on site, and if so, what would happen with the minerals?
- 4.4.9 With increased volumes of water coming into waterbodies such as Littleton Lake this could agitate sediment and lead to turbidity and sediment in the water column. However, there is no detail in the Consultation brochure on the wide-ranging monitoring that will need to be carried out post the construction of the RTS. The Applicant may want to familiarise themselves with planning conditions for existing MWPA permissions in the area, some of which include environmental monitoring requirements which may be of interest.

4.5 Landscape and Visual

Landscape design

- 4.5.1 It is important that the next stage of engagement provides further information on landscape and biodiversity design elements, such as new green infrastructure features, new landforms, habitat creation areas or other changes to topography and local landscape character, including from the influence of excavated materials or otherwise.
- 4.5.2 RTS is proposed in an area that is predominantly rural and flat in profile. For example, within the Borough of Spelthorne, the whole of the Laleham and Shepperton area is flat in character. Policy EN1 of Spelthorne Borough Council Core Strategy and Policies DPD states that proposals for new development should demonstrate that they will create buildings and places that are attractive with their own distinct identity; they should respect and make a positive

contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.

- 4.5.3 The previous consultation proposed beacon style hills up to 15m in height. It is understood from the Consultation that the Applicant intends to re-use excavated material for the habitat creation areas. Further clarification is sought and strong concerns raised on the quantum/volume of material to be removed and re-used and where /what implications this has for the landscaping design. The Project Group is concerned with regards to the potential design of the habitat creation areas, and how these will be integrated into the surrounding area. The Project Group feel it would have been valuable if the initial design of the habitat creation areas was provided within the Consultation to give the public an opportunity to comment on the landscape features, before the design advances too far. The Project Group is also concerned that the potential beacon-style hills proposed at the last consultation will be out of character with the existing area that is flat in profile.
- 4.5.4 Viewpoints will need to be agreed with the Project Group and further engagement is sought to enable appropriate technical input to this process. In due course, consideration should be given to producing visualisations for any predicted significant construction effects such as construction compounds and infrastructure including tall plant.
- 4.5.5 Further detail is sought on the 'raised walkways', in order to understand the implications on the landscape character of the area and amenity of existing residents (overlooking, loss of amenity)
- 4.5.6 We acknowledge that as part of the RTS further appropriate infrastructure may be required, such as car parking, in open spaces, however, this would need to be designed appropriately with the existing landscape character and Green Belt. For example, further clarification is sought and concerns raised on the possible future use of the Ferry Lane area, which should be appropriate to the Green Belt.

4.6 Socio-economics

Economic Viability

- 4.6.1 The RTS has the potential to generate a number of economic benefits. Such benefits should be clearly demonstrated, highlighting the net additional benefits that the RTS will deliver from those which already exist in the area.
- 4.6.2 The economic impact should the RTS not be delivered, should also be clearly reported, to further demonstrate the benefit of the RTS to the local economy.
- 4.6.3 Any impacts, both positive and adverse relating to increased visitor numbers should also be considered.

New public areas of green open space

- 4.6.4 The provision of new public facilities including sports pitches, bike tracks, sculpture trails and spaces for play and performance is welcomed. The facilities proposed by the RTS should be informed by a needs assessment, to ensure that any additional provision addresses any identified local deficits to ensure that the needs of the local community are met.
- 4.6.5 The socio-economic benefits of providing such facilities (and new areas of green open space) should be reported.
- 4.6.6 Any adverse impacts on increased visitor numbers should also be considered.

4.7 Transport

Sustainable travel routes/connection

- 4.7.1 The Project Group supports the provision of sustainable transport routes as part of the RTS, such as a public footpath routes running alongside the proposed channel. The Project Group are keen for the Applicant to consider a footbridge over the River Thames at Lower Sunbury as a component of active travel improvements, given existing community support for.
- 4.7.2 The Surrey County Council Local Transport Plan 4 (LTP4) was approved in July 2022 and sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. The commitment to support delivery of improved active travel networks through the scheme is in line with the aspirations of LTP4.
- 4.7.3 At a district and borough level, work is underway to develop Local Cycling and Walking Infrastructure Plans (LCWIPs). LCWIPs are currently being developed in Elmbridge, Spelthorne and Runnymede. They are the best practice approach nationally for planning walking and cycling improvements and seek to prioritise where investment should take place. Development of sustainable travel routes through the RTS should take the LCWIP work already underway into account. Best practice for designing cycling infrastructure is set out in LTN1/20, the government's guide for designing cycling infrastructure.

Construction movements

- 4.7.4 With regard to the excavation and transportation of material, it is noted that by applying the waste hierarchy the Applicant proposes to minimise the amount of material that is required to come on-site as well as material that needs to be taken off site to landfill. This is welcomed and further information is sought on potential HGV numbers/movements. However, there are still concerns about the principle of transporting and depositing inert material from Elmbridge to Spelthorne and the consequent level of lorry movements.
- 4.7.5 The Project Group encourages the use of the river for transportation of material during the construction, however, the location of jetties for barge loading is a potential concern due to the noisy nature of this activity. The potential impact on existing residential properties needs to be fully understood and considered.
- 4.7.6 There is no information on how connectivity with the river will be maintained during the works, whilst it is recognised that the RTS seeks to enhance this, the construction programme is lengthy and there could be negative impacts on active travel and leisure through reduced access to land and existing footpaths or river frontage.

4.8 Heritage and Archaeology

New public areas of open green space/Education Areas

- 4.8.1 The RTS runs through a landscape which previous investigations have demonstrated has a high potential to contain significant archaeological and paleoenvironmental deposits, particularly from the prehistoric and medieval periods. There is very limited reference to heritage considerations within the Consultation, however the Project Group is aware that a comprehensive suite of investigations has already been carried out during the planning for the project since 2016. This includes desk based research, geophysical and LIDAR survey and geoarchaeological and archaeological evaluation. This work has produced a good understanding of the likely impact of the proposals on below ground deposits and has enabled areas of particular sensitivity to be identified and evaluation strategies designed accordingly, which should be shared with stakeholders. Some areas have not been subject to physical investigation due to logistical reasons and some further work remains to be carried out.

- 4.8.2 It is noted that proposals for the location and nature of proposed habitat creation areas are still at an early stage of design and further engagement will follow.

4.9 Biodiversity

Lowering the riverbed from Desborough Cut

- 4.9.1 The existing Desborough Cut channel is uniform and heavily modified, any further deepening won't be impacting any natural channel bed formation but rather a trapezoidal channel design with minimal bed variability. However, there is a risk of disturbance of fine sediment resulting in the mobilisation of silts which could lead to water quality impacts, if not managed appropriately.
- 4.9.2 A comprehensive package of pollution prevention measures would be required to avoid accidental pollution events during works, and to minimise silt pollution to the River Thames. Measures could include source control, settlement tanks, silt fencing, and dust suppression. Works to the River Thames should be carried out in accordance with Construction Industry Research and Information Association (CIRIA) guidance, in particular C532 Control of water pollution from construction sites, C650 Environmental Good Practice on Site, and CIRIA C648 Control of water pollution from linear construction projects.
- 4.9.3 Works should be undertaken in consultation with the EA and in accordance with any restrictions on in-river working to avoid sensitive periods for fish passage or spawning. In particular the Applicant should also consider the timing of the deepening of the channel to avoid sensitive coarse fish spawning season (March – mid-July) and the risk of direct impact on depressed river mussel. The areas should be surveyed, and appropriate mitigation developed to avoid impacts within the zone of influence of the works.
- 4.9.4 Consideration should be made to the functionality of the upstream reaches which may change as a result of increased capacity, as well as consideration of sediment movement and deposition in low flow conditions which may refill the deepened sections over time. Specialised contractors will be required to complete the dredging works and consultation with the EA should be sought with regard to design, mitigation and management of dredged material.

New Public Areas of open green space/Education Areas

- 4.9.5 Whilst the provision of new public open space and education areas is welcomed, it is important that the RTS considers potential adverse effects from increasing public access and associated recreational activities.
- 4.9.6 A number of the waterbodies within the study area support overwintering birds associated with the Southwest London Water Bodies Special Protection Area (SPA). Dependent on their level of usage by the birds, these waterbodies may be considered Functionally Linked to the SPA as they support the functionality and integrity of the SPA. There is a requirement for competent authorities (the Planning Inspectorate) to consider the importance of functionally linked habitats in Habitats Regulation Assessments (HRAs) when assessing new plans or projects to ensure the Conservation Objectives for the site can still be delivered. As such the RTS will need to fully consider potential effects to South West London Waterbodies SPA from the proposed new public open space and education areas and associated recreational activities.
- 4.9.7 In addition, the RTS will need to fully consider potential adverse effects from increasing public access and associated recreational activities to other sensitive habitats and species. For instance, sensitive habitats such as unimproved hay meadows and open mosaic habitat (OMH) could be affected by trampling or nutrient impacts from dog faeces. Species such as otter and some breeding bird species are likely to be sensitive to elevated levels of noise and visual disturbance.

- 4.9.8 Increased recreation could also result in higher risk of impacts to sensitive habitats and species through the import of invasive non-native species (INNS), which are present in this stretch of the River Thames. Species such as *Crassula helmsii* could be transported between waterbodies through movement of people, pets (e.g. dogs), or equipment (e.g. paddleboards).
- 4.9.9 The proposed lakes along the RTS are designated as Site of Nature Conservation Importance (SNCI) and their value to wildlife would potentially be impacted by changes to the ecology brought about by the introduction of INNS. Robust mitigation measures will need to be provided to prevent changes to the lake ecosystems which may stop the lakes being used by the overwintering birds for which the SNCIs are primarily valued.

Suitable Accessible Natural Greenspace (SANG)

- 4.9.10 The Consultation brochure sets out that, 'Alongside the channel there will be opportunities to create recreational spaces for the community'. There is an opportunity for a new SANG to be delivered as part of the RTS as part of the recreational offer. An ongoing supply of SANG land will enable the Project Group to continue to support new housing development in the County, due to the proximity of the Thames Basin Heaths Special Protection Area (TBHSPA) which forms part of the National Site Network, and which is afforded the highest level of habitat protection against harm arising from development and other actions.
- 4.9.11 Runnymede Borough Council have provided a briefing note (see **Appendix A**) which provides more information about the TBHSPA and SANG, where it is believed a SANG could be located within the RTS and the benefits of providing a SANG.
- 4.9.12 Consideration would need to be given as to whether any SANG provisions would be part of the BNG solution for the scheme or in addition to it.

Habitat Creation

- 4.9.13 The inclusion of significant areas of habitat creation is welcomed and will assist the RTS in meeting national targets for biodiversity recovery and legal and planning requirements around biodiversity net gain (BNG). However, the Consultation does not explicitly include reference to BNG.
- 4.9.14 The type of habitats provided should be guided by the local context (i.e. the existing habitats and species present in the local area), and by regional and local priorities set out in Local Biodiversity Action Plans or similar. Species provided should be of native origin and be resilient to likely changes associated with climate change.
- 4.9.15 Habitat creation areas should be designed with regard to standard industry guidance, in particular: *Biodiversity Net Gain. Good practice principles for development. A practical guide* (2019).
- 4.9.16 In areas where both habitat creation and open space provision are proposed, consideration will need to be given to the potential for negative effects to habitats from recreational use of these areas. In particular, nutrient impacts from dog faeces, trampling of vegetation by people, and burning of vegetation and soils through the use of BBQs can all have detrimental effects.
- 4.9.17 Furthermore, clarification is sought if the BNG provisions will serve only the RTS or if a surplus will be provided for allowing developers to make a financial contribution to deliver part of the BNG improvements associated with the RTS.
- 4.9.18 In addition to habitat creation areas, it is recommended that the RTS also considers enhancement of existing habitats within the project boundary. This could include vegetation management, removal of INNS, strategic management to reduce recreational impact. Habitats to be created should be subject to long-term monitoring and management to ensure they meet their design parameters.

Severance

- 4.9.19 The RTS has the potential to result in severance of terrestrial habitats, creating an island sandwiched between the RTS and the River Thames. The only way to move from this island onto land will be via roads and bridges. This will potentially force terrestrial animals whose territories and foraging routes are now bisected by the channel to use the roads and could lead to increased mortality from vehicle collisions. It is recommended that consideration be given to construction of green bridges or other engineering solutions to facilitate animal movement through the landscape away from roads and road bridges. Careful consideration and design should be given to terrestrial fauna navigation routes.

4.10 Health and Social Value

New public green space areas

- 4.10.1 In addition to the welcome focus on open space to support physical activity, the Consultation brochure would benefit from framing provision and access to new green open space primarily as an opportunity to improve physical, mental health and wellbeing. Re-framing open spaces through a health lens will align the RTS closer to the strategic priorities outlined in Spelthorne, Runneymede and Elmbridge councils' Health and Wellbeing strategies, which are more widely informed by Surrey County Council's Health and Wellbeing strategy. These strategies frame open space as enabling greater physical activity, improving mental health outcomes, and acting as a wider determinant of health.
- 4.10.2 We recommend that the RTS expands its focus beyond the provision of 'leisure activities' in open spaces to embrace a wider range of activities that would capture the attention of people not willing or able to be engaged in physical activities. Health benefits can also arise from using open spaces in other ways e.g., being in the space, through art and culture, or as an informal place to gather. This is particularly important for ensuring the RTS reaches out and is inclusive of as many people as possible. In addition, Surrey's and Spelthorne's Health and Wellbeing Strategies supports social prescribing. It would be helpful to explore with the public how open space can act as a platform to deliver social prescribing.

New habitats

- 4.10.3 Whilst the creation and improvement of natural habitats is a key objective of the RTS, the Project Group recommend integrating this with individual and community health and wellbeing, by involving communities in long-term habitat management and maintenance. Suggested activities include gardening, food growing, and wildlife education. Integrating communities with the local environment has potential to further improve physical and mental health and conserve the ecosystem. This recommendation would be dependent on whether the Applicant is willing to offer up opportunities for the public to be involved in maintenance and management. It would be prudent to consult communities and local wildlife groups on this.

Construction compounds

- 4.10.4 There is no information provided on location of construction compounds to enable sustainable construction methods to occur as stated in the Consultation brochure. Construction compounds has the potential to give rise to health and well-being impacts relating to increased levels of lighting, noise, air quality and traffic implications.

4.11 Noise and Vibration

- 4.11.1 It is noted within the Consultation brochure that more information on noise and vibration impacts will be provided in the next consultation.

- 4.11.2 To be able to consider and comment on potential noise impacts, details on construction and operational noise and vibration, impacts should be provided, along with any mitigation which is necessary.
- 4.11.3 The commitment to sustainable construction including the use of existing materials as far as possible, reducing the amount of material needed to be brought onto site and removed from the site is noted, and it is acknowledged that this should reduce the impact of noise in terms of reduced vehicle movements.
- 4.11.4 In relation to noisy works, the need for continuous construction noise monitoring should be discussed and agreed with the relevant Local Planning Authority, including works associated with barge movements/deliveries.
- 4.11.5 Operational noise impacts expected to be assessed and mitigated where necessary, include change in noise associated with water flow, the suitability of new amenity areas with respect to noise from new and existing sound sources, and noise impact from new amenity uses.
- 4.11.6 The use of sound survey data obtained during the Covid lockdown should not be used as this would provide an unrealistic baseline.

4.12 Air Quality

- 4.12.1 It is noted in the Consultation brochure that more information on air quality impacts will be provided at the next consultation.
- 4.12.2 It is welcomed that one of the aims of the RTS is to create more sustainable travel network to link communities and increase access to open space for leisure, recreation, and active travel away from the busy road network which will encourage use of sustainable transport modes, thereby working towards reducing road traffic emissions.
- 4.12.3 In addition, it is welcomed that the waste hierarchy will be applied to reduce the amount of material waste from the RTS through the reuse of material on-site where possible. This in-turn will help to reduce the number of vehicle movements generated by the RTS during the construction phase.
- 4.12.4 The Applicant is encouraged to consider other ways to further reduce construction vehicle emissions such as using low emissions plant and vehicles where practicable and considering the routing of vehicles away from areas of poor air quality, placement of construction compounds and site access points in locations that minimise the impacts on local air quality, and route planning and optimisation such as routing strategies so that persistent impacts on the same stretches of road or road junctions are reduced.
- 4.12.5 The impact of road traffic emissions during the construction of the RTS will be a key issue. There are areas of known congestion and traffic-related air quality issues where construction traffic may travel, for example Walton Bridge / A244, Hampton Court Bridge / A309 and the A317 through Weybridge. In addition, the impact of road traffic emissions resulting from the RTS at the strategic road junctions (such as Sunbury Cross) are a concern especially where there may be cumulative impacts with other construction works and mineral extraction / landfill traffic locally. If possible, direct access from the M3 to a scheme compound should be considered as this would be beneficial in reducing air quality impacts at receptor locations where pollutant concentrations are already high.
- 4.12.6 Proposed leisure facilities, visitor centres and/or riverside businesses such as cafés may attract traffic, and this should be considered within the air quality assessment. Suitable EV charging infrastructure should be planned for parking and servicing areas to ensure that low emission

vehicles are accommodated. Supporting businesses that hire equipment for leisure such as paddle boards, canoes, fishing equipment and bicycles use would potentially reduce the need for people to access the leisure areas by car.

- 4.12.7 Tree planting and woodland improvement is welcomed and would help to maintain air quality benefits.

4.13 Climate

- 4.13.1 Section 1.3 (page 11 of the Consultation brochure) states that the challenges of flooding are forecast to increase with climate change. It also mentions properties being flooded in 2014. It should be noted that climate change is already causing impacts, and this includes more recent extreme rainfall events that followed a period of drought, leading to flooding this summer/autumn across the country. Without this context there is a risk that the importance of the RTS is underplayed or worse, that climate change is a phenomenon being seen as something in the future not something that is already happening.
- 4.13.2 In Section 4 of the Consultation brochure, the topics to be included within the Environmental Statement are listed, however climate change has been excluded. The Project Group would expect to see climate change feature in the EIA for the scheme, not least because it should result in significant beneficial effects in terms of climate change adaptation. We acknowledge that in the EIA Scoping Report for the scheme that climate change has been scoped in.
- 4.13.3 Section 4.3 of the Consultation brochure *“by applying the hierarchy, we will minimise the amount of material that needs to come on-site, as well as materials that need to be taken offsite to landfill. This will help to reduce construction traffic, air quality and noise impact, and reduce our carbon footprint”*. There is no other reference to the potential lifecycle carbon impact of the scheme. Reducing waste and embodied carbon in materials will assist to reduce the negative effects and is likely to be an important part of the climate change impact assessment. Carbon emissions from other sources should also be assessed and mitigated.
- 4.13.4 The RTS has an opportunity to consider climate change in habitat creation proposals to maximise carbon sequestration and to provide resilient habitats and landscaping. Further opportunities to reduce emissions should be identified at early design stages and should include, for example, selection of materials with less embodied carbon, sourcing local materials, construction practices that reduce reliance on diesel plant and equipment.

5 Summary and Next Steps

5.1 Summary

- 5.1.1 The Consultation seeks opinions regarding the RTS proposals to lower the riverbed downstream of the Desborough Cut, the provision of a more sustainable travel network, better access to open green spaces, and improved connections to wildlife and habitat quality. However, there is a lack of detail for stakeholders to review design and provide feedback. The Consultation should have provided greater detail on the design of the public provisions.
- 5.1.2 There is also a lack of clarity about the scheme proposed and no clear position on matters such as the proposed landscape strategy and if proposed beacons/ mounds will still form part of the proposed scheme. These are key elements of the scheme where community engagement and involvement are required yet this Consultation does not appear to deal or address this. It is understood that further information will follow as part of a series of technical workshops with statutory stakeholders and a Statutory Consultation will be held toward the end of 2023. There is a concern that stakeholder will be overloaded with information at the Statutory Consultation in 2023 and have limited time to influence proposals.

Principle areas of environmental concern

- The Project Group has concerns regarding the channel going through landfill sites. There is no specific information in the Consultation brochure as to which landfills would be impacted and how the Applicant will protect the rest of the landfill, the water channel and the environment.
- Where excavated landfill material is intended for re-use within the scheme, assessment of the risks to human health and livestock is required, as well as the potential impacts of this re-use on groundwater and surface water quality. Additionally, the methods of assessing excavated waste material for suitability for re-use (geochemically and geotechnically) should be provided.
- The movement and management of material is key to understanding the potential environmental impacts for transport, air quality, noise, climate and waste. Further information is required on construction logistics (i.e. barge movements) of material movement and re-use.
- The impact of road traffic emissions during the construction of the Scheme will be a key issue. Walton Bridge / A244, Hampton Court Bridge / A309 and the A317 through Weybridge are areas of known congestion and traffic-related air quality issues, where construction traffic may travel. In addition, the impact of road traffic emissions resulting from the RTS at the strategic road junctions are a concern especially where there are cumulative impacts. Direct access from the M3 to a scheme compound should be considered to reduce air quality impacts at receptor locations where pollutant concentrations are already high.
- The constant supply of water to the reach will allow flow variation and different sediment processes to occur within the channel; which will help control fine sediment distribution through the scheme. Therefore, it is necessary to ensure that the non-flood water levels are high enough to maintain a flow through the scheme and prevent stagnation of water to occur.
- The proposed scheme will be located in an area that is predominantly rural and flat in profile. The previous consultation proposed beacon style hills up to 15m in height. It is understood from the Consultation that the Applicant intends to re-use excavated material for the habitat creation areas. Further clarification is sought on the quantum/volume of material to be removed and where /what implications this has for the landscaping design. There is a lack

of detail about the quantity of material being deposited within the County and the consequence of this on the landscape environment. The Project Group are concerned with regards to the potential design of the habitat creation areas and how these will be integrated into the surrounding area.

- In areas where both habitat creation and open space provision are proposed, consideration will need to be given to the potential for negative effects to habitats from recreational use of these areas. In particular, nutrient impacts from dog faeces, trampling of vegetation by people, and burning of vegetation and soils through the use of BBQs can all have detrimental effects.
- Due to the potential increase in visitor numbers to the area as a result of the RTS and the potential pressure this may have on the TBSPA, there is an opportunity for a new SANG to be delivered as part of the RTS as part of the recreational offer.

5.2 Next Steps and Recommendations

5.2.1 Further engagement and technical workshops are recommended with the Project Group to inform on-going design work for the RTS. The Project Group recommend the following:

- Whilst the creation and improvement of natural habitats is a key objective of the RTS, the Project Group recommend integrating this with individual and community health and wellbeing, by involving communities in long-term habitat management and maintenance. The Project Group recommends that further information/engagement is undertaken with the local community to gain local 'by-in' of the scheme design relating to the public amenity provisions.
- It is recommended that consideration be given to construction of green bridges or other engineering solutions to facilitate animal movement through the landscape away from roads and road bridges. Careful consideration and design should be given to terrestrial fauna navigation routes.
- In addition to habitat creation areas, it is recommended that the RTS also considers enhancement of existing habitats within the project boundary. This could include vegetation management, removal of INNS, strategic management to reduce recreational impact.
- We recommend that the RTS expands its focus beyond the provision of 'leisure activities' in open spaces to embrace a wider range of activities that would capture the attention of people not willing or able to be engaged in physical activities. This is particularly important for ensuring the RTS reaches out and is inclusive of as many people as possible.
- Development of sustainable travel routes through the RTS should take LCWIP work already underway into account. Additionally, more information should be provided on how active travel networks will be incorporated and implemented into the scheme. The Project Group would also request a footbridge to be provided over the River Thames at Lower Sunbury.
- The Applicant should also consider the timing of the deepening of the channel to avoid sensitive coarse fish spawning season (March – mid-July) and the risk of direct impact on depressed river mussel. Consideration should be made to the functionality of the upstream reaches which may change as a result of increased capacity, as well as consideration of sediment movement and deposition in low flow conditions which may refill the deepened sections over time.
- The design of the habitat creation areas should be designed with the community in mind and be a space for the community to enjoy, not just on a physical level but also in terms of place setting and health and wellbeing.

Appendix A Proposal for use of land associated with the RTS for Suitable Accessible Natural Greenspace

The following proposal has been put forward by Runnymede Borough Council

Background

The Thames Basin Heaths Special Protection Area (SPA), including the Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC) is a network of heathland areas stretching across parts of Surrey, Berkshire and Hampshire. The SPA (& SAC) forms part of the National Site Network which is afforded the highest level of habitat protection against harm arising from development and other actions.

The closest areas of SPA (& SAC) to Runnymede are at Chobham Common which abuts the Borough's western boundary and Horsell Common just to the south. From 2005 onwards, mitigation for the increase in visitor numbers on the SPA/SAC and urbanisation arising from residential development has been required.

In this respect, Natural England advises that no net additional residential units should be granted planning permission within 400m of the SPA/SAC, mitigation in the form of SANG at 8ha per 1,000 population is required for development within a 400m-5km radius and SANG at 2ha per 1,000 population is required for net residential development of 50+ units within a 5km-7km radius.

The majority of Runnymede Borough lies within the 400m-5km zone of influence, with areas in the north of the Borough within the 5-7km zone. A small proportion of the Borough at Longcross is within 400m of the SPA/SAC and a small proportion at the northern edge of the Borough is outside any zone of influence.

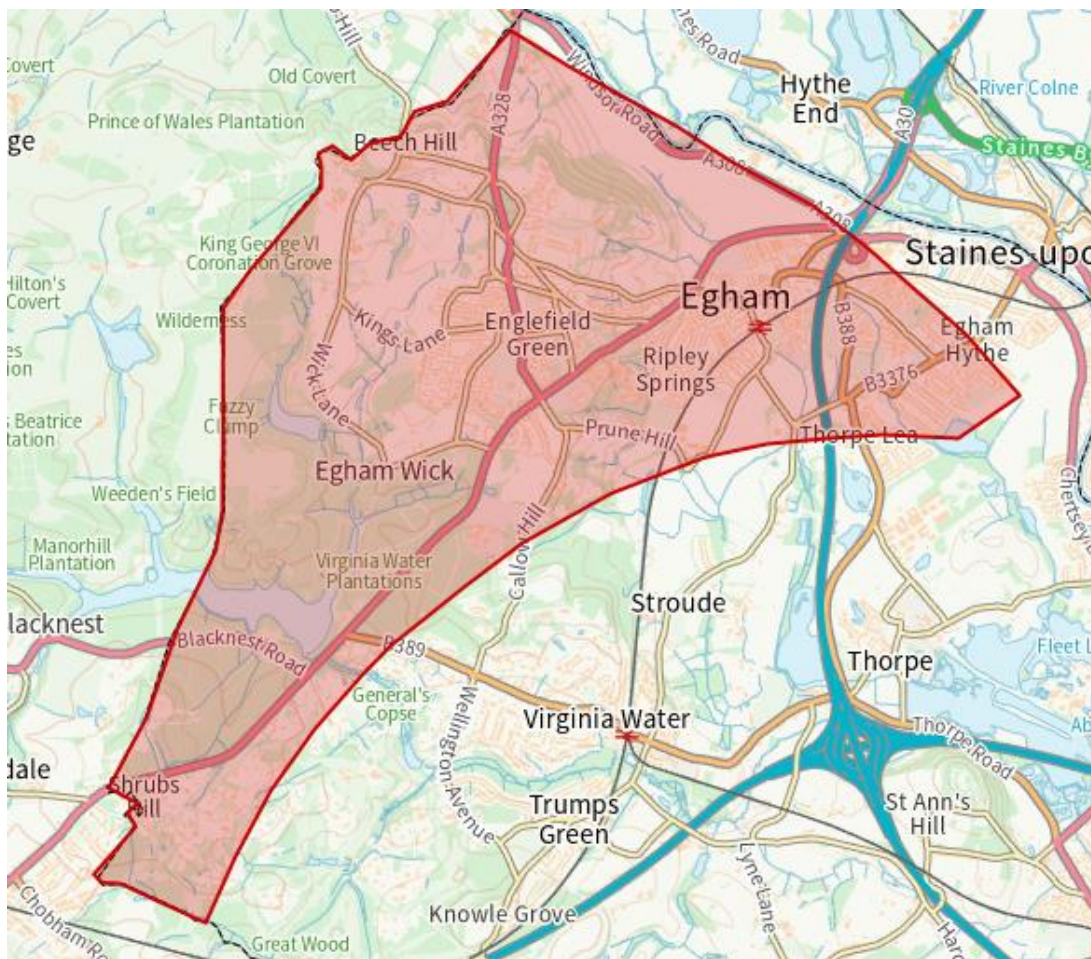
SANG can either be provided by the local authority (using its own land or through CPO) or through third parties who bring forward bespoke SANG to mitigate their particular development. The majority of SANG in Runnymede have been brought forward by the Borough Council on land within its ownership. For this type of SANG, the Borough Council carry out works to bring the land up to SANG standard (see below) and then manage/maintain in perpetuity. The costs associated with this are passed on to developers who make financial contributions to the Borough Council on a per occupant (net) basis through S106 agreements.

Developments of 9 net additional units can be assigned to any SANG within the Borough, however developments of 10+ net additional dwellings must be assigned to a specific SANG and be within that SANG's catchment area (see below).

Current SANG Capacity in Runnymede

Runnymede Borough Council currently manages 6 SANG sites. As at July 2022, the remaining SANG capacity of all 6 sites is 2,578 occupants or around 1,050 dwellings. However, of the 6 SANG sites, only the SANG at St Ann's Hill has a catchment which includes the north area of the Borough either within the 400m-5km zone or the 5-7km zone. As such, when capacity at St Ann's Hill SANG runs out there will be no effective mitigation for development within the north of the Borough. The map below shows the extent of Runnymede's SANG catchments and SPA zones of influence.

The current capacity at St Ann's Hill SANG is 130 occupants (around 50 units). When this runs out, as can be seen in the map below, this effectively means that a large part of Egham Hythe, land west of the M25 including Egham town centre and the whole of Englefield Green would have no SANG mitigation, effectively barring housing development of 50+ units in Egham and 10+ units in the south of Englefield Green (area shaded red on the map).



The Need for Additional SANG Capacity

Runnymede does not have sufficient SANG to implement all development allocated in the Runnymede 2030 Local Plan. This was acknowledged during the Local Plan Examination in Public (EiP) and the Plan was still found to be sound on the basis of there being a reasonable prospect that additional SANG would be found over the plan period. Without additional SANG, particularly to cover the north of the Borough, allocation sites at Blay's House, Englefield Green and Thorpe Lea Road North, Egham would be at risk. If the Egham Gateway East allocation and Egham Library Opportunity Area proposed 50 or more units these would also be at risk.

In addition, based on the Government's Standard methodology for calculating housing need, over the next plan period (most likely to be 2026-2041), the Council should be seeking to accommodate 8,235 dwellings. Assuming three quarters of this comes forward in the 400m-5km zone and one quarter in the 5-7km zone this would give an estimated SANG capacity requirement between 2025 – 2040 of around 134ha. This would be in addition to any residual requirement for the 2030 Local Plan estimated at 30ha¹. As such, there is an estimated additional requirement of 164ha to 2040.

Existing SANG capacity at July 2022 is 2,578 occupants or around 20.5ha². Potential new SANG, their capacity and catchments are also identified at the following locations:

30ha at the Longcross Garden Village site – catchment will only serve Longcross.

11.5ha (Hardwick Lane) – 4km catchment covering Addlestone (including Rowtown), Chertsey, Lyne, Longcross, Ottershaw, Thorpe & Thorpe Lea, Virginia Water

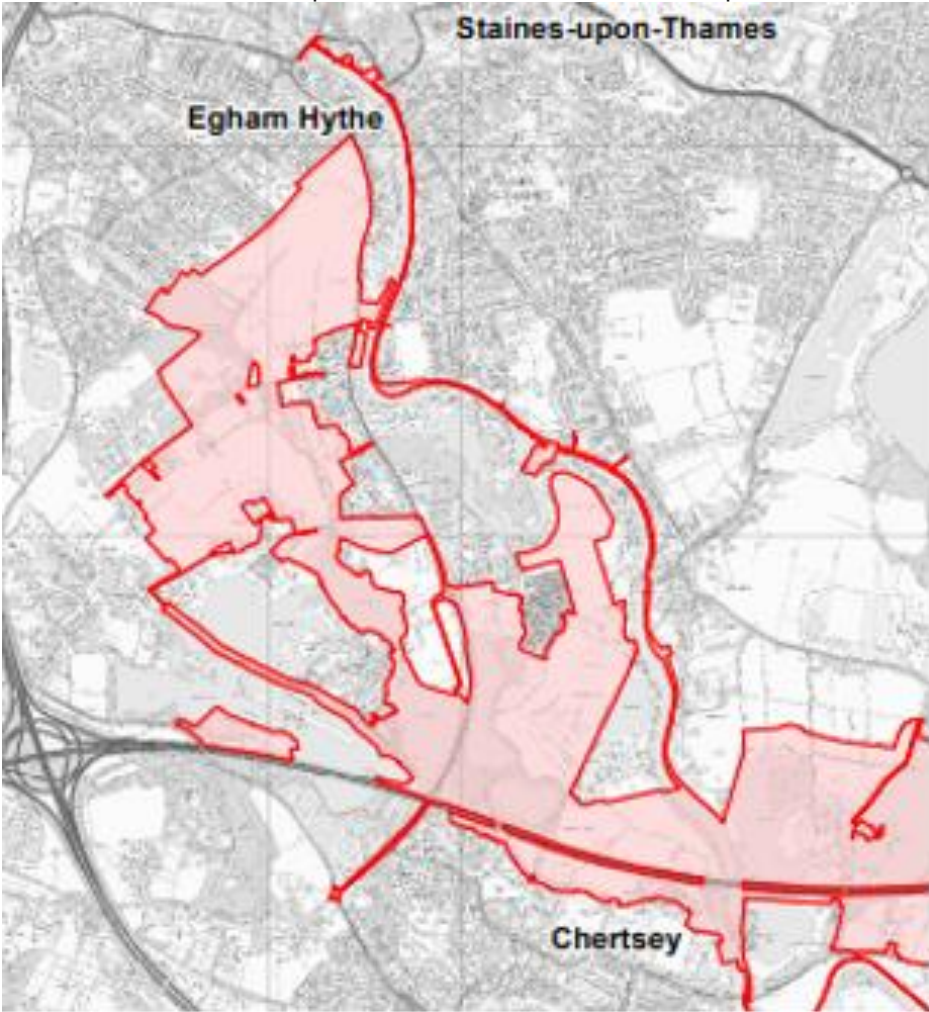
Even with these additional SANG factored in, a high level estimate is that 102ha of SANG still needs to be identified to support growth up to 2040.

¹ Based on 3 years of 2030 Local Plan annual requirement (2022-2024) at 500dpa = 1,500 dwellings or 3,750 occupants (using Census 2011 occupancy ratio for Runnymede of 2.5) and 8ha per 1,000 occupant standard.

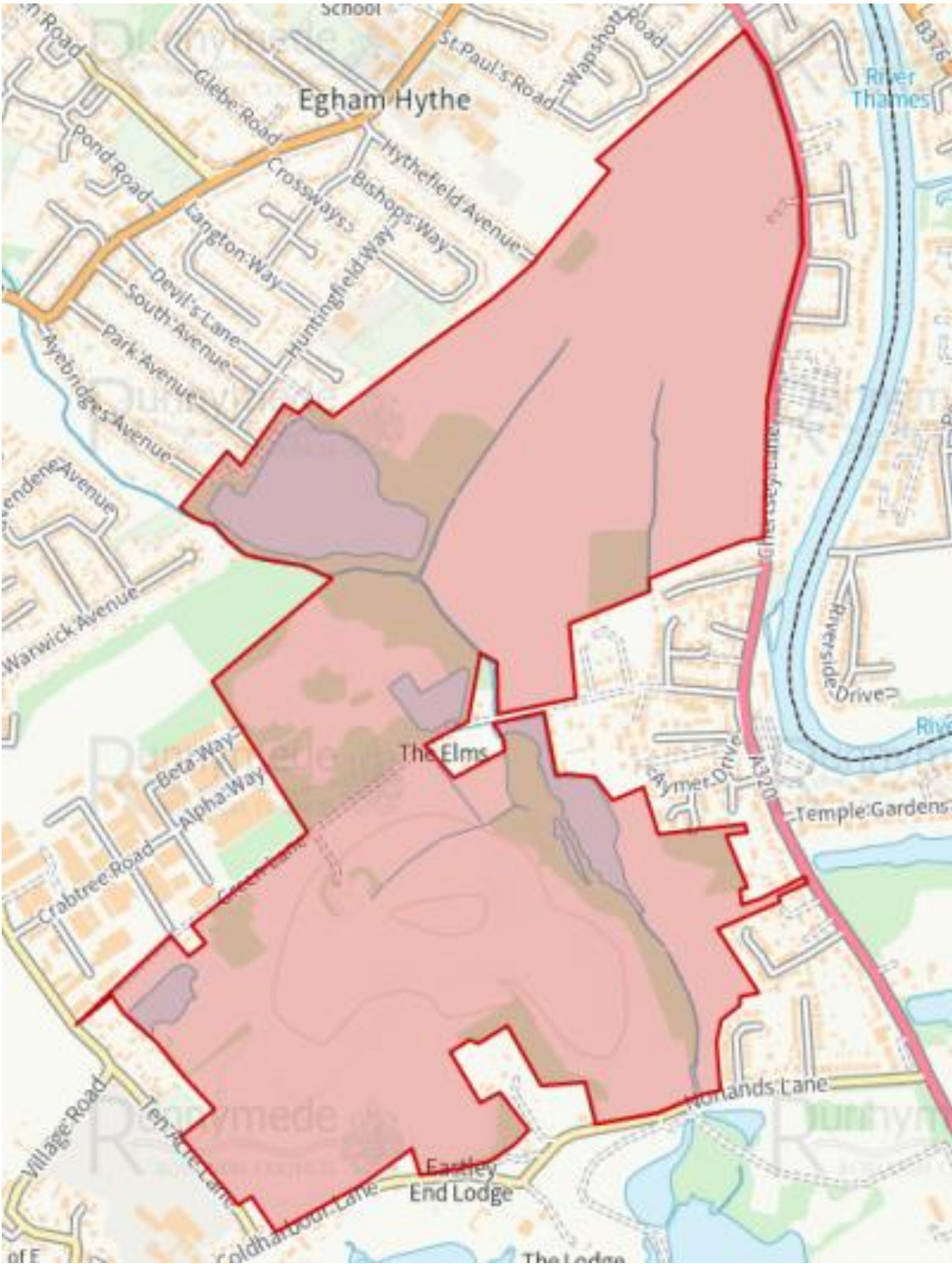
² Assuming an 8ha per 1,000 standard given the limited capacity at St Anns Hill SANG.

RTS as an opportunity for SANG

Current estimated land requirement for RTS set out in the map below.



This includes a substantial amount of land that could (subject to Natural England agreement) be used as SANG, particularly an area to the south of Egham and east of Thorpe as shown in the map below. This area covers approx. 112ha (discounting the area for the RTS channel itself and the Thorpe Hay Meadow SSSI). Whilst it is acknowledged that competing uses for this land may be proposed (such as sports pitches, open space etc), it could still be possible to deliver these alongside a substantial area of SANG which would go a long way to ensuring sufficient SANG capacity to 2040 for the Borough and also cover an area of the Borough where only limited SANG capacity remains.



Natural England have provided guidance on the different elements required to make a SANG. These are set out in Appendix 5 of the Runnymede Thames Basin Heaths SPA SPD³. To summarise, there are a number of elements that a SANG must have, the most relevant includes a 2.5km circular walk, adequate public car parking, must be perceived as semi-natural, SANG over 12ha to provide a variety of habitats, unrestricted access to dogs and dog walkers and be free from unpleasant intrusions.

³ [Supplementary Planning documents and other guidance – Runnymede Borough Council](#)

Other desirable features for SANG include linking to longer 5km walks, gently undulating topography, provide areas of open (non-wooded) countryside, areas of dense & scattered trees/scrub and open water, larger SANG to have 5km circular walks.

It is considered that the land associated with the RTS and shown in the map above is capable of achieving all of the SANG 'must have' criteria and many of the desirable criteria.

Natural England also set out guidance for the extent of SANG catchments based on the size of the SANG. SANGs of 2-12ha in area have a catchment of 2km, for those between 12-20ha this rises to 4km, and SANG of 20+ha have a catchment of 5km. The RTS has the ability to deliver an area of SANG greater than 20ha and as such would have a 5km catchment. This would cover development in Egham, Chertsey, Englefield Green, Thorpe, Virginia Water and potentially parts of Addlestone.

Other Benefits

SANG would achieve a multi-functional role including a number of other benefits on top of TBH mitigation, such as:

- Creation of a large accessible space of natural/semi-natural habitat with potential to link to wider strategic green & blue infrastructure network i.e. River Thames, Colne Valley Regional Park, Runnymede Meadows
- High potential for Biodiversity Net Gain (BNG) including enhancement of priority habitat (deciduous woodland and lowland meadow) and helping to deliver Thames Valley Biodiversity Opportunity Area (BOA) (Unit TV04 Thorpe & Shepperton) objectives and targets which include:
 - Priority habitat restoration and creation which includes:
 - Standing open water
 - Floodplain grazing marsh
 - Acid grassland
 - Wet woodland
 - Reedbeds
 - Priority species recovery which includes: by 2020 evidence of at least stabilisation and preferably recovery in the local populations of listed priority species including:
 - Greater water parsnip⁴
 - Marsh stitchwort³
 - Lapwing
 - Watervole³
- Helping to deliver climate change mitigation through carbon sequestration in natural environment/habitat creation

Conclusion

The delivery of SANG within the RTS has the potential to make a substantial contribution to the delivery and implementation of the Runnymede 2040 Local Plan. At the same time as helping to deliver Local Plan growth aspirations it can also fulfil a multi-functional role in delivering accessibility and connectivity to the Runnymede and wider GBI network, help deliver BNG and BOA objectives/targets as well as help to achieve climate change mitigation through carbon sequestration.

⁴ Noted as probably extinct within the BOA area.