

River Thames Scheme

Summary of the Project Group's Response to Statutory Consultation



On behalf of **the Project Group**

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document sets out a summary of the Project Group's (Surrey County Council, Runnymede Borough Council, Spelthorne Borough Council and Elmbridge Borough Council) response to the River Thames Scheme (RTS) Statutory Consultation (22 January 2024 – 4th March 2024). 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 Statutory Consultation, hereafter referred to as the Consultation, to inform stakeholders of the proposed scheme and adhere to sections 42, 47, and 48 of the Planning Act 2008. The Project Group support the principle of the development in achieving flood alleviation and climate change adaptation solutions, whilst providing a new landscape-based approach to creating healthier, more resilient and more sustainable communities.

1.2 Scheme Overview

1.2.1 The RTS proposes an integrated scheme comprising the following:

- Creation of a new flood relief channel in two sections through Runnymede (4.8km long) and Spelthorne (3.2 km long). The channels will be formed by connecting together existing lakes and 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 through excavation to increase channel capacity. Additionally, improvements will be made to the Sunbury, Molesey, and Teddington weirs.
- Provision of new green and blue open spaces at a variety of locations.
- A new Active Travel Route (ATR) and snaking rampart landform will run for the length of the scheme. Two pedestrian and cycle bridges proposed at Chertsey and Desborough Island.
- The Scheme proposes to improve and create high quality natural habitats (also known as habitat creation areas), biodiversity net gain (BNG), and carbon neutral construction.

1.2.2 The Scheme aims to deliver benefits for communities and the environment, 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. The Scheme will be the first flood and climate adaptation project which is described as nationally significant.

1.3 Need for the Scheme

1.3.1 Flood defence and resilience is severely lacking along the stretch of the River Thames between Egham and Teddington, resulting in it being the largest area of populated but undefended floodplain in England.

1.3.2 Due to the landscape being dominated by major infrastructure and mineral workings the open space available is not utilised effectively. The stretch of the River Thames between Egham and Teddington has lots of potential to provide economic, health and environmental benefits to the community.

1.4 Engagement

- 1.4.1 Prior to the Consultation, the Applicant has provided a series of coordination sessions to provide programme/roadmap updates, as well as technical briefing sessions to deliver further information on topic areas requested by the Project Group. The briefing sessions have been focused on the following topics:
- Channel design, landfill and contaminants
 - Materials Management
 - L&GI design updates and workshops
 - Materials and Waste
 - Temporary Works
 - Permanent Works
 - Water Quality
 - Ferris Meadow Lake
 - Flood Modelling
- 1.4.2 A large part of the ongoing engagement has been focused on the Landscape and Green Infrastructure element of the Scheme. This has included two L&GI workshops, in February and August, respectively. Lots of feedback was provided, although the key point was regarding a preference for the green open spaces to be designed for passive use and not for active sporting facilities (such as a bmx park) as it is important that the scheme should first seek to address the need for the local community. The ATR) itself will act as an attraction and heavily developed facilities will be costly to manage.

2 Adequacy of Consultation

2.2 Project Group Response to the SoCC (2023)

- 2.2.1. The Project Group worked closely with the Applicant on the Statement of Community Consultation (SoCC) to provide a Consultation that is tailored to the local community and stakeholders. A series of requests were raised by the Project Group in our response to the draft SoCC on July 5th 2023 which were addressed in the revised draft SoCC as part of the formal consultation on the SoCC (October 17th 2023 to November 23rd 2023).

2.3 Approach to Statutory Consultation

- 2.3.2 The Consultation aims to gather opinions from the general public, landowners, local authorities, community groups and environmental and regulatory organisations, on the proposals for the Scheme. It is important that the Consultation is effective in conveying the Scheme's potential benefits and impacts to enable key stakeholders to provide relevant feedback to help the development of the Scheme.
- 2.3.1 As detailed in the SoCC, the Applicant must consider all relevant comments submitted in response to the Consultation. This feedback will be carefully analysed to establish key areas of concern which will help to shape the Scheme prior to the DCO application being submitted. A Consultation Summary Report will be produced to record the feedback provided and detail how it has changed the Scheme.
- 2.3.2 The Consultation is a hybrid consultation, incorporating online and in person events, at a variety of locations. The programme for these events has been advertised on the RTS website, in local newspapers, and on social media.

Digital EIA

- 2.4.1 An engagement session on Digital EIA took place in July 2023 with the Project Group. Suggestions such as interactive mapping and the ability to filter by relevant environmental topics have been incorporated into the Digital PEIR and GIS storymap. However, the GIS storymap platform is very basic, it would have also been useful to show the existing waterways, lakes, rivers, ditches and proposed project components to demonstrate how the project is utilising existing infrastructure. In addition, a fly through of the Scheme would have been beneficial.

Equalities

- 2.5.1 The Consultation documents have been reviewed in terms of the Public Sector Equalities Duty. The Environmental Design Principles set out by the Applicant which include principles relating to best practice on inclusive engagement. Further comments on equalities relate to inclusivity in the design of the public open spaces, for example 'make space for girls', inclusion of toilets along the route, and the use of not appropriate terminology within the Consultation material.

2.4 Project Group Approach Review

- 2.4.1 The following documents were issued as part of the Consultation and have been reviewed by the Project Group:
- Consultation brochure;
 - Map book;
 - Preliminary Environmental Information Report (PEIR);
 - PEIR: Non-Technical Summary (NTS);

- Flood Modelling Report NTS;
- Integrated Scheme Description;
- Response to Matters Raised;
- Environmental Design Principles;
- Feedback Form;
- Environmental Effects of the RTS – Next Steps;
- Statement of Community Consultation (SOCC); and
- Second Consultation Summary Report (2023).

2.4.2 The final Statutory Consultation response will include detailed feedback on each document issued as part of Statutory Consultation. For this report, we have summarised the principal areas of concern in Section 3 below.

3 Summary and Next Steps

4.1 Summary

- 4.1.1 The Consultation is being carried out in accordance with the Planning Act (2008) and seeks opinions regarding the updated Scheme Design since Non-Statutory Consultation, as well as preliminary assessments and proposed mitigation which is presented in the PEIR.

4.2 Principal Areas of Environmental Concern

Lack of detail regarding preferred strategy

- 4.2.1 There appears to be a lack of detail regarding the preferred strategy of the Scheme. While this is discussed in Paragraph 4.5.2.4 of the EIA Scoping Report, the Project Group would expect to see further detail in the PEIR in order for stakeholders to understand the hypothesis more clearly. A number of improvements such as non-structural floodplain management tools, community-based measures such as flood defences to groups of properties were discussed in the EIA Scoping Report but not in the PEIR. As a result of this, there is also a lack of commentary on the potential environmental effects of the evolving scheme and improvement options.

EIA Process

- 4.2.2 The EIA Regulations require “*the monitoring of any significant adverse effects on the environment of proposed development*”, however there is no information outlined in the PEIR regarding construction or operational monitoring of identified significant effects. The Applicant’s approach to identifying effects that will require monitoring needs to be made clearer.
- 4.2.3 The PEIR notes that six car park locations are being considered for off-site car parking for construction workers. At Paragraph 2.3.2 of Appendix 2.1, it is noted that “*as a precautionary measure, environmental effects associated with these car park locations have therefore been assumed to be significant for all topics within the PEIR and will be assessed further in the ES.*” According to Regulation 12(2)(b) of the EIA Regulations, the PEIR “*is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)*”. However, as a result of not narrowing down the scope and assuming significant effects associated with all technical disciplines, it has not been possible to develop an informed view.

Methodology

- 4.2.4 Some elements of the methodology used throughout the PEIR are disputed. Further detail is provided in the tables in Appendix C; however, some examples have been drawn below:
- Chapter 19 (Cumulative Effects) paragraph 19.4.2.7 of the PEIR notes that only those receptor groups likely to experience a ‘significant effect’ will be included within the intra-project assessment – however, two non-significant effects combined have the potential to lead to a significant effect. i.e. adverse noise impacts and adverse air quality impacts on a residential occupant may be non-significant on their own merit, but if happening at the same time, this could be considered significant. The methodology needs to be reviewed to ensure the assessment is robust and accurate.
 - Chapter 8 (Climatic Factors) paragraph 8.4.2.14 of the PEIR states that the contribution of the Scheme’s emissions to the UK carbon budgets will be used to assess likely significant effects. IEMA guidance state that national level budgets are a starting point for contextualisation but that this has limited value. The concern here is that, despite setting out IEMA’s significance criteria within the methodology, the assessment will fall back on the Scheme’s percentage contribution to National carbon budgets to determine significance. This approach does not demonstrate whether a project is compatible with a trajectory to net zero. Given that one of the primary aims of the Scheme is to respond to the challenge of

climate change, the explanation of how the ES will determine significance needs to be much clearer.

- Regarding Chapter 17 (Traffic and Transport) it should be noted that although vehicle flow volumes are returning to pre-pandemic levels, it should not be assumed that the 2019 data is still fit for purpose. This is because there is evidence that the daily profile has changed, particularly in the PM. In a number of locations, the PM peak has shifted from 17:00-18:00 to 16:00-17:00. It is recommended that checks are done at key locations to ensure that 2019 data is suitable and the results of those checks shared with local authorities.

Matters Scoped In / Out

4.2.5 In Chapter 4 (Approach to Environmental Assessment), changes to matters scoped in or out of the EIA as a result of the Scoping process with PINS are discussed, however not all of the changes noted have been carried through to discipline topic chapters of the PEIR as would be expected. Further detail is provided in the tables in Appendix C; however, some examples have been drawn below:

- Paragraph 4.2.3.2 notes that “Effects from loss of any existing public open space” is noted to be scoped into Chapter 11 (Health), however this is not referenced in Chapter 11. We would expect an assessment to be made as to whether loss of public open space creates a deficiency in that area with appropriate mitigation detailed accordingly.
- The response from the Applicant at section 3.14.1 of Appendix 4.1 confirms that nothing is scoped out of the Cumulative Effects Assessment (CEA), however at section 19.2.2.1 of the EIA Scoping Report it is stated that because the study area for Materials and Waste covers England and the South East of England, respectively, they were discounted from the CEA as this would not result in a proportionate assessment – this needs to be made clearer to the reader and confirmed with PINS. If not confirmed with PINS, this could lead to the ES not being aligned with the latest Scoping Opinion and being contradictory to Regulation 14 (3) (a) of the EIA Regulations which states the ES must “*where a scoping opinion has been adopted, be based on the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*”.

4.2.6 In addition to this, the PEIR does not make it clear where some matters are scoped in or out of the EIA. For example, at Paragraph 4.2.4.4 of Chapter 4, it is stated that effects from the transportation of non-hazardous materials from the major road network and placement off-site is now proposed to be scoped out of the EIA. However, it is understood that transportation of non-hazardous and hazardous waste within the project boundary and to the major road network is scoped into the EIA as per Paragraph 4.2.4.5. It is not clear as to whether this includes the major road network itself.

4.2.7 Finally, there are areas where matters recommended by PINS to be scoped into the EIA are challenged by the Applicant and appear to remain scoped out of the EIA. While in principle this is not an issue for the Project Group (if justified), in some places it is still unclear as to how the conclusion has been drawn. For example, in Table 4.1 of Chapter 4, it appears as though the Applicant has chosen to keep operational changes to the hydromorphological conditions at weirs on protected and notable habitats and species scoped out. However, there is a lack of evidence to support the Applicant’s stance that ‘*changes to the hydromorphology of the River Thames are within the range of variance of existing flood flow conditions*’ and justify that there will be no significant effects upon these receptors. To confidently scope out aquatic ecology impacts relating to hydromorphology, modelling needs to be undertaken to provide evidence how the capacity improvements will not alter downstream conditions.

Additional Receptors to be Assessed

4.2.8 Following a review of the PEIR and associated documentation, the Project Group request that some additional receptors are assessed as part of the EIA. A few examples are provided below:

- Regarding health, reference should be made in the ES to the effects of the Scheme on social cohesion, which has not been sufficiently addressed in the PEIR. The Scheme has the potential to open up new communities and affect existing local population while also bringing about changes in terms of visitor populations in certain communities.
- While the effect of barges during construction appears to be considered within the Traffic and Transport Chapter and Air Quality Chapter, it does not appear to be assessed within the Noise and Vibration Chapter of the PEIR. The noise impact of use of barges during construction should be considered and assessed within the noise and vibration chapter of the ES.
- Appendix 14.1 Noise survey report refers to the PEIR for assessment of noise impacts to biodiversity, however there is no assessment provided in the PEIR. It is recommended that an assessment is undertaken to appropriately quantify risk of both waterborne and airborne noise on wildlife receptors.

Mitigation

- 4.2.9 Chapter 4 (Approach to the Environmental Assessment) section 4.5 (Approach to Mitigation) of the PEIR does not provide information on how mitigation will be secured. This is required to aid understanding of how the Applicant will be committed to delivering the mitigation they propose. For example, it is assumed that the Construction Environmental Management Plan (CEMP) will be secured via a DCO Requirement.
- 4.2.10 The PEIR states that the preliminary assessments detailed do not assume full achievement of the primary and tertiary mitigation stated, and that all effects assessed are prior to the implementation of secondary mitigation but that it is considered unlikely that secondary mitigation will be required. It also notes that any secondary mitigation that will be required has not been included within the PEIR as it has not yet been fully developed. While this approach was communicated through two engagement sessions with the Project Group (22nd and 30th November, 2023), it has made understanding the likely significant residual effects of the Scheme difficult and presents a 'worst-case scenario' on all matters. It is clear that mitigation measures need to be identified and assessed across all EIA topics prior to the submission of the ES and that further engagement with the relevant LPA's regarding mitigation is vital.
- 4.2.11 Management plans are set out within the topic chapters and are considered as tertiary mitigation. We do not agree with this approach. As outlined in IEMA's Guide to Delivering Quality Development, tertiary mitigation are '*actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects*' (IEMA, 2016). Although these actions are often included within a draft CEMP (or similar) to ensure they are highlighted to the Principal Contractor, the CEMP itself is not considered tertiary mitigation.
- 4.2.12 In general terms, primary and tertiary mitigation are considered to be inherent to the Scheme and its design and therefore should have already been taken into account prior to the assessment of effects (albeit noting that the PEIR assumes that not all primary and tertiary mitigation is fully implemented). Secondary mitigation is then used to further reduce the level of effect, resulting in residual effects. Therefore, there should not be a vast number of significant effects as presented in the PEIR.
- 4.2.13 For carbon in particular, it is concerning that no primary mitigation has been identified given that the majority of emissions are expected to result from the design of the development and that opportunities to reduce carbon are greater at early design stages. It was expected that at this stage, measures that apply the carbon mitigation hierarchy can be set out even if only in outline (simply stating it will be applied does not identify mitigation secured by the design), particularly in relation to designing clever and efficiently. This could have, for example, included outcomes from carbon management workshops that are referred to within the EIA Scoping Report.

Contradicting Statements

- 4.2.14 A number of contradicting statements have been made throughout the PEIR and associated documents. This leads to uncertainty for the reader and we would urge the Applicant to provide clarity on these matters as soon as possible. Whilst further information is provided in the tables below, some key examples are as follows:
- Chapter 10 (Flood Risk) Paragraph 10.7.2.2 of the PEIR states that there will be “*Potential permanent positive effects on all NPPF classes of vulnerability to flooding from an overall reduction in flood risk from all sources*” and then goes on to state the following: “*Potential permanent negative effects on all NPPF classes of vulnerability to flooding due to potential permanent changes to groundwater flows causing an increase in flood risk*”. The fundamental principal of the project is to reduce flood risk. If there is a significant impact from groundwater flooding, the project is not achieving its objective and the Scheme should be altered to accommodate this.
 - Within Chapter 8 (Climatic Factors), it is stated that significance will be determined based on net change (magnitude) of GHG emissions but then goes on to state that IEMA guidance will be used. IEMA state clearly that significance should not be determined by magnitude. This contradiction is shown in the first and second sentence of Paragraph 8.4.2.8. Stating ‘however’ suggests the method will not follow IEMA guidance, yet the chapter later goes on to state that IEMA significance criteria will be used.

Landscape Design

- 4.2.15 A principal area of concern raised by the Project Group in their response to Non-Statutory Consultation was that thorough consideration needed to be given to the proposed landscape design and the implications this would have on the existing landscape character. While it is understood that the previous beacon style hills concept is no longer proposed and the raised landforms have been reduced in height, which we consider to be the right approach in principle, we don’t feel as though this has been addressed sufficiently in the PEIR.
- 4.2.16 The potential for significant adverse landscape and visual effects from new landforms is acknowledged in Chapter 12 (Landscape and Visual Amenity), however it appears as though the extent of change to the existing landscape character is underplayed in the assessment. We would suggest that a more detailed contextual explanation of new landforms is required. There are also still concerns regarding the quantum/volume of material to be removed and where /what implications this would have for landscaping in practice. There is a lack of detail about the quantity and composition material being deposited in the boroughs and the consequence that this could potentially have on the landscape.
- 4.2.17 More evidence would be required to support the Applicant’s assertion that potentially significant adverse landscape and visual effects could become positive within an approximate 15 year timeframe, solely due to the influence of maturing screening vegetation. Whilst the profiling and contouring of new landforms may be handled skillfully in order to give them a naturalistic appearance, they are still uncharacteristic of the flat floodplain topography and therefore are arguably incongruous to existing landscape character.
- 4.2.18 The Environmental Design Principles document provided little reassurance on how permanent structures such as the weirs, water level control structures, etc will be sensitively designed to complement the landscape. The principles within this document are more attributed to Scheme objectives and lack detail on material, size, lighting, energy efficiency, etc of new permanent infrastructure.

Ferris Meadow Lake

- 4.2.19 The Consultation presents seven options for the channel route at Ferris Meadow Lake, which has previously been presented to the Project Group (20th November 2023). In assessing these options, the Project Group would need to consider the visual impact, impact on protected trees, contamination issues and water quality of the lake. Based on the limited information and lack of

details, submitted to date, the Project Group is not able to indicate the preferred option(s) at this stage. It would be beneficial to see the detail and the various assessment outcomes to undertake an informed review prior to any decision being made. In addition, the development of this area would be of concern given that the lake side is covered by a large number of trees (see Figure 4.1 below) which are protected by Tree Preservation Orders (TPO's) and the area to the west of the lake is known landfill.



Figure 4.1 Map of Ferris Meadow area with TPO's in yellow.

Risk to Contamination

- 4.2.20 The baseline for Chapter 16 (Soils and Land) is stated to have been informed by previous GI data, however this has not been provided or summarised to the Project Group thus far, noting that the PEIR states that the GI had identified that two further landfills contained elevated concentrations of contaminants. It is stated that the chapter in the ES and the hydrological risk assessment will be based on the GI data currently being gathered, however regulators have not seen the scope for this GI and therefore would not be able to conclude that it will provide adequate characterisation.
- 4.2.21 In relation to likely significant effects relating to soils, Chapter 16 (Soils and Land) has little detail on actual ground conditions and there will be a lot of interpretive work needed to determine what mitigation is necessary and to what standard areas will be remediated.
- 4.2.22 All but one of the potential significant effects identified at EIA scoping stage (including human health) are now noted to be non-significant within Chapter 16 (Soils and Land) and most identified that, as an Environmental Permit (EP) will be in place which will require measures such that significant effects will not occur. We are concerned that the PEIR does not identify what aspects of the construction the EP(s) will cover – the EP(s) need to cover excavation, transport, temporary stockpiling, processing and re-use – if all activities are not covered then the assumption that all impacts from landfill wastes will be adequately reduced is potentially incorrect. While it is clear that there are sources of contamination other than the landfills may be present on site, those which would not have the benefit of an EP are not identified. If works

in these areas are not being undertaken under an EP, then it is considered that reliance on tertiary mitigation (standard working practises (we don't consider plans should be included in tertiary mitigation as these are project specific)) may not be appropriate. Ultimately this can only be determined once the ground investigation information is available. We would highlight it is essential that adequate data and robust characterisation is presented in the ES to justify the applicant's approach.

- 4.2.23 Where excavated landfill material is intended for re-use within the Scheme, assessment of the risks to human health and all fauna and flora 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 Project Group raised this as a principal concern in response to non-statutory consultation but no additional information has been provided in the PEIR.
- 4.2.24 When referencing the potential for exposure to contaminated soils, leachate, ground gas, contaminated groundwater and contaminated surface water, mitigation is discussed in terms of water quality monitoring. However, this is not clear whether this is surface water, ground water or both and subsequent remedial activities are not defined. It would be expected that volumetric testing and in situ testing of soils would be applicable as well as ground gas monitoring as is standard practice for areas of historic landfill if gassing is determined. It is too early to determine these effects as non-significant and secondary mitigation is not adequately covering the issues raised. Given the complexities associated with the excavation and treatment of previously deposited mixed waste materials and with the proposed use of a proportion of that material on land then intended for public access for recreational use we would expect to see a clearer commitment to provide detailed and site-specific monitoring, management and action plans in respect of the control of contaminant release via soil, water and air.
- 4.2.25 Overall, there is too much reliance placed on yet to be defined mitigation measures - it is prudent to understand the role that management, monitoring and action plans have to play in the effective management of construction phase and operational impacts, the approach taken for the Scheme thus far is too high level. Given the complexities associated with the excavation and treatment of previously deposited mixed waste materials and with the proposed use of a proportion of that material on land then intended for public access for recreational use, we would expect to see a clearer commitment to provide detailed and site-specific monitoring, management and action plans in respect of the control of contaminant release via soil, water and air.
- 4.2.26 Further engagement with the Project Group is required to agree mitigation to the appropriate standards taking into account the GI and modelling findings. This consultation should take place prior to the publication of the ES to allow LPA comments to be incorporated.

Transport

- 4.2.27 There is a lack of detail in the PEIR regarding construction routes and accesses, what the proposed highway structures are, and where they are located. As a result, there is also a lack of commentary on the potential environmental effects of these elements of the Scheme which makes it difficult for the Project Group to make an informed judgement of the Scheme at present.
- 4.2.28 There is concern regarding the compound located, the current Saddlers Ride access is noted to be very busy and unsuitable for two-way traffic which could make accessing this compound unsafe at Hurst Park. The Project Group request details of the number and types of vehicles that will be entering / egressing the compound and information regarding its access. An alternative route may be required.
- 4.2.29 As the construction work will be locationally specific it will be important that local assessment work is agreed with the relevant local authority. For example, should substantial amounts of material for the Desborough Cut need to be transport by road instead of by water then it is likely local assessment work will need to be undertaken to consider the effects and potential mitigation on Cowey Sale, the junction of Walton Lane with the A244 and potentially other key junctions

on the A244. It should be indicated where such local assessments might be required, irrespective of the results from the strategic modelling work.

- 4.2.30 Paragraph 6.5.1 of Appendix 17.1 states that “*a minimum one-way working traffic management system will be maintained throughout the construction of the highway structure with no road closures planned*”. The Project Group expect that these restrictions will be included in the modelling being undertaken to assess the construction impact during peak hours. It would also be helpful if the method for representing these restrictions in the model is discussed with local authorities before modelling is commenced. The location and method of control for such restrictions will help to determine the impact on the network; recent experience suggests that such restrictions can be extremely disruptive, and they will also affect the journey times of related construction traffic.
- 4.2.31 Overall, Chapter 17 (Traffic and Transport) of the PEIR lacks detail and therefore only very high-level comments can be provided. It is recommended that more focused engagement be undertaken with Surrey County Council (Transport Development Team).

Maintenance

- 4.2.32 It is important when creating green spaces that provision for adverse impacts due to increased visitors to the area should be provided and not just considered. This would include managing issues such as:
- Litter
 - Drug paraphernalia
 - Dog fouling
 - Anti-Social Behaviour (ASB)
 - Fly tipping
 - Monitored CCTV
 - Security
- 4.2.33 There is no indication within the PEIR as to how this will be managed and looked after; all aspects will require constant monitoring to avoid areas becoming derelict and uncared for.
- 4.2.34 It is suggested that the Applicant consider the option for this to be an ongoing project for the Surrey Community Payback Teams and/or the inmates from Bronzefield who are keen to learn new skills which should have a positive impact and deter reoffending. Additionally, there is potential that local companies be encouraged to manage this space through employee release schemes.
- 4.2.35 As noted above, due to the scheme having such a long construction program, followed by the presence of infrastructure that could give rise to ongoing nuisance, such as odour, there needs to be arrangements and a process established for ongoing communications with both LPAs and residents.

Missing / Lack of Information

- 4.2.36 Following a review of the PEIR and associated documents, the topic assessments lack the level of information that would have been expected at PEIR stage to help stakeholders understand the assessment process and determine the potential significant effects of the Scheme.
- 4.2.37 Whilst more detail is provided in the tables below, some examples are as follows:

- As stated below under the Mitigation section, the PEIR assessment includes the reliance on many management plans, for which the details have not been included within this Consultation. Therefore, the Project Group have not had the opportunity to review and provide reassurance to the assessment outcomes.
- PINS Scoping Opinion states that “*It is noted that the route presented does not include the Littleton South Lake or Old Littleton Lane Lake, although the Littleton South Lake is linked by culvert to the Littleton North Lake. Will the impact of the scheme on the Littleton South Lake and Old Littleton Lane Lake be assessed in terms of soils, flood risk and water environment?*” – whilst this is referenced in Chapter 18 (Water Environment), it is not mentioned in either the Flood Risk or Soils and Land PEIR Chapters.
- In Chapter 8 (Climatic Factors) Section 8.5.2.2 of the PEIR states that early calculations to determine the likely significant effects regarding climate have been undertaken, however these are not presented in the PEIR. As a result, it is difficult to comment on the likely significant GHG effects and how these have been considered against a trajectory to net zero.
- Appendix 9-3 is mis-labelled and is not the ‘River Thames Stage 2 Trial Trench Evaluation: Chertsey Abbey Meads, Chertsey’ as stated but instead a study of samples from selected trenches at Abbey Meads. The evaluation report should have been included in this submission for stakeholder review and comment.
- At Table 2-48 of Appendix 4.1, the Applicant responds to the Project Group’s EIA Scoping Opinion regarding provision of the DBS for comment (Paragraph 16.2.1.1) noting that it will be provided as an appendix to the ES. This report is requested by the Project Group prior to submission of the ES as this provides the first step in the Conceptual Site Model (CSM) and will be useful when discussing the Ground Investigation.
- The health study area is shown in Figure 5.14 of Volume 3 of the PEIR but it is not clear why there are some Middle layer Super Output Areas (MSOA) that overlap the 'health study area' boundary but are not included in the baseline data. The following MSOAs are located within the 500m buffer but are not included in the Health Study Area:
 - Spelthorne 010
 - Spelthorne 007
 - Elmbridge 003
 - Elmbridge 005
 - Runnymede 001
 - Runnymede 002

Programme

- 4.2.38 The programme for construction start is relatively ambitious (mid-2026) considering the Figure on page 111 of the Consultation Brochure states that DCO decision is anticipated in 2026. It appears as though the discharge of pre-commencement DCO Requirements has not been considered.

4.3 Next Steps and Recommendations

Further Engagement

- 4.3.1 A key theme that has been noted when reviewing the PEIR and associated documentation is the need for further engagement with stakeholders such as the Project Group and local

community groups, particularly in relation to providing the detail behind baselines across topics, mitigation and landscape design.

- 4.3.2 Another key theme is that there is a lot of information missing that would be expected to have been provided by this stage of the process that should be provided for the Project Group to review prior to DCO submission.
- 4.3.3 Given the status of the PEIR and the development of the primary and secondary mitigation, it is difficult to comment at this stage on the adequacy of the mitigation already proposed, therefore, further engagement is needed with the Project Group.
- 4.3.4 We are aware that the proposals for the landscape design process are ongoing, however public health considerations need to be actively factored into these mitigations, alongside meeting the needs of vulnerable groups. For example, minimising the closures and diversions of PRowS during construction and encouraging maximum use of new green and open spaces through offering a mixture of spaces of recreation activities.
- 4.3.5 Additionally, as mitigation develops through the DCO process, the Project Group would expect critical documentation to be issued for review and comment i.e management plans including, but not limited to, the:
- Air Quality Management Plan,
 - CEMP
 - Materials Management Plan
 - PRow Management Plan
 - Lighting Plans
 - Construction logistics plan, Construction Travel Plan, Construction Traffic Management Plan, Construction Logistics Plan, Operational Travel Plan
 - Emergency Plan
 - Site Waste Management Plan
 - Construction Surface Water Management Plan
 - Soil resource plan

Recommendation

It is acknowledged that the flood defence and resilience is severely lacking along the stretch of the River Thames between Egham and Teddington. The principle of creating a flood relief channel to improve the existing flooding situation is welcomed. However, as stated above, there is a lack of detail throughout all the assessments that have been undertaken leading to inconclusive results which do not effectively narrow down the scope for the EIA. Although the Project Group is confident that all required assessments will be carried out in due course, prior to the DCO application, it is concerning to see the lack of detail at this stage in the process. This does not allow the Project Group to provide the required level of input into the design of the Scheme. Therefore, there is a need for the Applicant to reassure the Project Group with targeted engagement providing further detail and draft plans for review well in advance of DCO submission.

4 List of Acronyms

Abbreviation	Full Text
ASB	Anti-Social Behaviour
ATR	Active Travel Route
BNG	Biodiversity Net Gain
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
CSM	Conceptual Site Model
DBS	Desk-Based Study
DCO	Development Consent Order
EA	Environment Agency
EIA	Environmental Impact Assessment
EP	Environmental Permit
ES	Environmental Statement
GHG	Greenhouse Gas
GI	Ground Investigation
GIS	Geographic Information System
IEMA	Institute of Environmental Management and Assessment
L&GI	Landscape and Green Infrastructure
LPA	Local Planning Authority
MSOA	Middle layer Super Output Areas
NPPF	National Planning Policy Framework
NTS	Non-Technical Summary
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PRoW	Public Rights of Way
RTS	River Thames Scheme
SoCC	Statement of Community Consultation
TPO	Tree Preservation Order

5 Glossary

Term	Definition
Anti-Social Behaviour	Persistent, ongoing, and unreasonable behaviour.
Active Travel Route	A publicly accessible route used for recreation and commuting. In the context of RTS, the proposed active travel route will connect with the existing Public Right of Way (PRoW) network and public open spaces, along with the new green and blue open spaces.
Air Quality Management Plan	A comprehensive document describing the motivations for air quality management, qualitative and quantitative findings on the impacts of air pollution on the megacity, and most importantly, targeted actions and a path forward for mitigating sources of air pollution.
Biodiversity Net Gain	An approach to development and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. It delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. It can be achieved on site, off-site or through a combination of on/off-site measures.
Cumulative Effects Assessment	Identifies and characterises the potential for in-combination (intra) and cumulative (inter) project effects and then assesses the significance of these effects.
Construction Environmental Management Plan	The purpose of a Construction Environmental Management Plan (CEMP) is to outline how a construction project will avoid, minimise or mitigate effects on the environment and surrounding area.
Conceptual Site Model	The underpinning element of the contaminated land risk assessment process. The conceptual site model identifies the different type of risk and categorises the sources of contamination; potential receptors; and the identification of potential contamination pathways, thus determining and assessing pollutant pathway linkages.
Construction Logistics Plan	The Construction Logistics Plan focuses specifically on construction supply chains and how their impact on the road network can be reduced. The construction supply chain covers all movements of goods, waste and servicing activity to and from site.
Construction Traffic Management Plan	A document that outlines the steps that a project needs to follow to manage the flow of traffic around a construction site safely
Construction Travel Plan	A document which outlines the sustainable travel initiatives during the construction phase.
Construction Surface Water Management Plan	A plan to ensure that surface water quality and quantity is managed throughout the construction process to mitigate impacts off site.
Development Consent Order	The form of consent that is granted under the Planning Act 2008 for NSIPs and projects of national significance brought into the regime by a Section 35 Direction. Application for a DCO is made to the Planning Inspectorate (PINS) who will consider the application and make a recommendation to the Secretary of State (SoS), who will decide on whether development consent should be granted for the proposed scheme.
Environmental Impact Assessment	An assessment process applied to development proposals that are likely to have significant effects on the environment. EIA allows the interaction of environmental effects resulting from the proposed Scheme to be predicted, and therefore reduced or avoided through the development of mitigation measures.
Environmental Permit	An environmental permit grants official approval for activities/developments that have the potential to impact the environment.

Environmental Statement	The document produced to describe the environmental impact assessment process and results where statutory EIA is required.
New green/blue open space areas	New areas of recreational value for the public that are either land-based (green) or water-based (blue).
Ground Investigation	A combination of desk-based research and intrusive investigations to establish the soil and rock profile and parameters to understand the ground conditions and sub surface structure of a site.
Geographic Information System	A system that creates, manages, analyzes, and maps all types of data. GIS connects data to a map, integrating location data (where things are) with all types of descriptive information (what things are like there).
Habitat Creation Areas	The establishment of a new habitat, often in an area where the original habitat has become unsuitable for the species that once lived there.
Institute of Environmental Management and Assessment	IEMA is the largest professional body for environmental practitioners. IEMA sets environmental standards and offers guidance on best practices.
Landscape and Green Infrastructure	Green infrastructure includes connected networks of green space, such as parks, open space and woodlands.
Lighting Plans	Outlines the strategic placement of lighting within a site.
Local Planning Authority	A group of planning officers representing Runnymede, Spelthorne and Elmbridge Borough Councils and Surrey County Council who the project is engaging with in a regulatory capacity.
Materials Management Plan	A plan to ensure compliance with Environment Agency regulations for excavated ground material by those developing a site. It should consider protection of human health and environment, suitability for material with or without treatment, how much material is used and where the material is being used.
Middle layer Super Output Areas	Generated automatically by zone-design software using census data from groups of LSOAs. They have a minimum size of 5,000 residents and 2,000 households with an average population size of 7,800. They fit within local authority boundaries
Mitigation	Actions that are taken to minimise or prevent negative effects of the project.
National Planning Policy Framework	A national policy framework which sets out the Government's economic, environmental and social planning policies for England.
Nationally Significant Infrastructure Project	Nationally Significant Infrastructure Projects (NSIPs) are large projects consented by way of a Development Consent Order (DCO). Usually involving energy, transport, water or waste these projects are automatically within the Planning Act 2008 regime.
Non-Technical Summary	A brief overview of a report in non-technical language.
Preliminary Environmental Information Report	A report which is prepared to inform consultation with the public and other stakeholders about the likely significant effects of the scheme. The PEIR supports the statutory consultation process under the Planning Act 2008 to comply with Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Planning Inspectorate	The national authority that deals with planning appeals, nationally significant infrastructure project applications, projects of national significance applications, examinations of local plans and other planning-related and specialist casework in England.
Primary Mitigation	Modifications to the location or design of the development made during the pre-application phase that are an inherent part of the project, and do not require additional action to be taken.

Public Rights of Way	A highway where the public has the right to walk. It can be a footpath (used for walking), a bridleway (used for walking, riding a horse and cycling), or a byway that is open to all traffic (including motor vehicles).
PRoW Management Plan	A plan to address the interactions between the PRoWs and the Scheme, which describes how PRoWs would be managed to ensure they remain safe, and to minimise the disruption to the users.
Operational Travel Plan	A long term operational management strategy which encourages sustainable travel for new and existing developments.
Secondary Mitigation	Additional actions that are required to reduce the significance or likelihood of effects where an assessment has indicated they may arise following the application of primary and tertiary mitigation. These may be imposed as part of the DCO consenting process or be identified as necessary through the EIA and therefore included within the ES.
Site Waste Management Plan	A plan that details the amount and type of waste that will be produced on a construction site and how it will be reused, recycled or disposed of.
Soil Resource Plan	A soil management document to be used by contractors. It sets out clear guidance on the methods of recovering, storing and re-using soils whilst minimising a loss in quality and function.
Statement of Community Consultation	This document sets out how the Applicant intends to consult with the local community as required under the Planning Act 2008.
Tertiary Mitigation	Actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard or best practices used to manage commonly occurring environmental effects.
Tree Preservation Order	A legal protection for a specific tree or woodland that prevents deliberate damage and destruction. TPO's are made by the LPA's to protect valuable trees.