



Your ref: Regulation 19 Richmond Draft Local Plan  
Our ref: RTS-PLN-POL-RIC-001  
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24 July 2023

Dear Richmond Planning Policy Team,

## Regulation 19 Draft Richmond Local Plan

### Introduction

Please find enclosed representations to the Regulation 19 Draft Richmond Local Plan consultation on behalf of the River Thames Scheme (RTS). Our comments are provided below, following the general order of the topics presented in the Regulation 19 Draft Richmond Local Plan document.

The RTS is making a representation as the following elements of the RTS are proposed within the London Borough of Richmond upon Thames:

- Upgrades to Molesey Weir
- Upgrades to Teddington Weir

Where we wish to see policies strengthened, we have outlined the additional content we would like included in the form of recommendations that would benefit the RTS project. We have also referenced the relevant sections and policy numbers for ease of navigating our response. There are also policies that we support and we welcome the references to the RTS in the Infrastructure Delivery Plan 2023.

We note that consultation responses should focus on legal and procedural compliance, including the duty to cooperate, and the soundness of the Plan. The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant, but we consider that our proposed changes are required to make the Draft Local Plan effective in delivering joint working on cross-boundary strategic priorities, and therefore sound.

## RTS Background

The RTS is a multi-agency partnership, being led jointly by the Environment Agency and Surrey County Council.

The RTS represents a new landscape-based approach to creating healthier, more resilient, and more sustainable communities. The RTS will be an integrated scheme which responds to the challenges of flooding; creating more access to green open spaces and sustainable travel routes, in addition to encouraging inclusive economic growth, increasing biodiversity and responding to the dual challenges of climate change and nature recovery.

The River Thames between Egham and Teddington runs through the largest area of developed undefended flood plain 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, within a landscape which suffers from visual barriers and physical constraints which means the open space isn't used to its full potential.

The RTS will address these challenges to help create a sustainable, thriving and healthy community and promote inclusive economic growth. The RTS will reduce the risk of flooding to thousands of homes, businesses and vital infrastructure; it will create new areas of green open spaces with recreational facilities and connections to wildlife and it will provide sustainable travel connections to link it all together and create an improved resource for communities to enjoy.

As an integrated Scheme, the RTS will deliver:

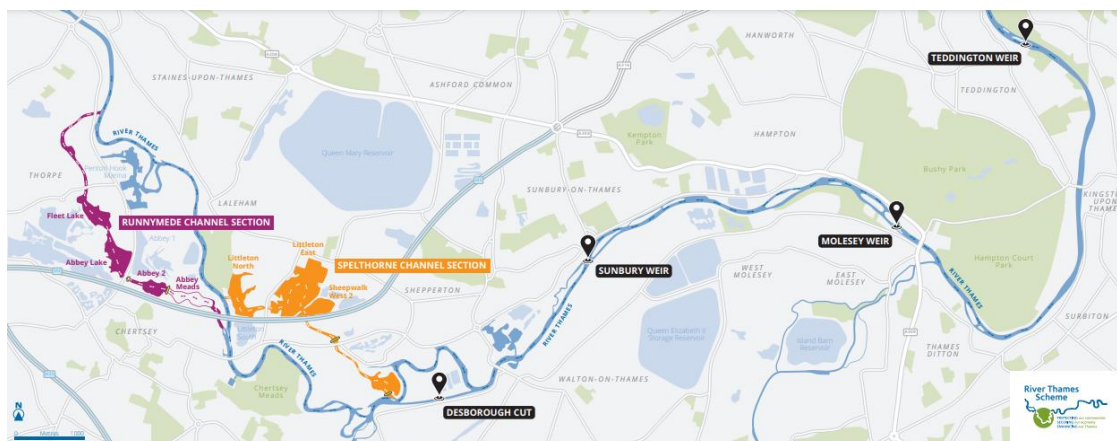
- A new river channel built in two sections – one section through Runnymede (between Egham Hythe and Chertsey) and one through Spelthorne (between Littleton North lake and the Desborough Cut)
- Capacity increases downstream of the Desborough Cut and the weirs at Sunbury, Molesey and Teddington
- Improved access to quality green open space and connections with wildlife, in addition to supporting a more sustainable travel network
- A network of high-quality habitat to achieve a biodiversity net gain.

Figure 1 below presents the current proposed location of the new river channel and the weir capacity improvements.

The large scale of the project means the government has directed it should be treated as a project of national significance under the Planning Act 2008. These projects require a type of consent known as a 'Development Consent Order' (DCO) and we are currently in the pre-application stage.

It should be noted that there is a clear separation of responsibilities and an ethical wall in place between the officers promoting the River Thames Scheme on behalf of the applicant and the officers who will perform a regulatory function as part of the Planning Act 2008 process within Surrey County Council and the Environment Agency.

**Figure 1: River Thames Scheme diagram**



## River Thames Scheme Representations - Regulation 19 Draft Richmond Local Plan

### Policy 2 – Spatial strategy: Managing change in the borough (Strategic Policy)

The RTS supports this policy, particularly part C which states: ‘*Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change, and protect and, where possible, enhance the environment, local character and heritage assets...*’

**Recommended action:** For information only, no action required.

### Policy 3 – Tackling the Climate Emergency (Strategic Policy)

The RTS supports this policy, particularly parts 5, 6 and 7 which state:

*‘5. adapt to the changing climate by minimising the effects of overheating, mitigating the urban heat island effect, managing flooding, and minimising energy consumption in accordance with the London Plan’s Cooling Hierarchy;*

*6. enhance and improve the borough’s green and blue infrastructure to ensure it delivers multi-functional benefits, such as enhancing micro-climates and natural carbon sinks as well as improving air quality;*

*7. adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity;’*

**Recommended action:** For information only, no action required.

## Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy)

The RTS is pleased to see that, in terms of flood defences, applicants will have to take into account the River Thames Scheme.

The RTS would like to see the council's support for the RTS embedded in Policy 8 itself, or in the supporting text. This is so that it is recognised that the RTS is an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements. In addition, it would be beneficial to replicate the below text in the evidence base in documents such as the Infrastructure Delivery Plan. We anticipate that the RTS will be operational in 2030.

**Recommended action:** Additional text could be added to Policy 8 or in the supporting text which states:

*The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme.*

*The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections, totalling over 5 miles (8.5 km) alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The River Thames Scheme will provide health benefits to communities as well as opportunities for tourism, recreation and leisure.*

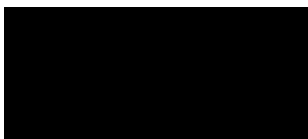
## Local Plan – Interactive Policies Map

The RTS requests that the proposed upgrades to Molesey Weir and Teddington Weir which are located within the London Borough of Richmond upon Thames are presented on your Policies map. We will share a shapefile so this can be added.

We hope that our comments are useful. We would welcome the opportunity to work with you to address our comments so that you may strengthen the current policy wording and supporting text in the Draft Plan.

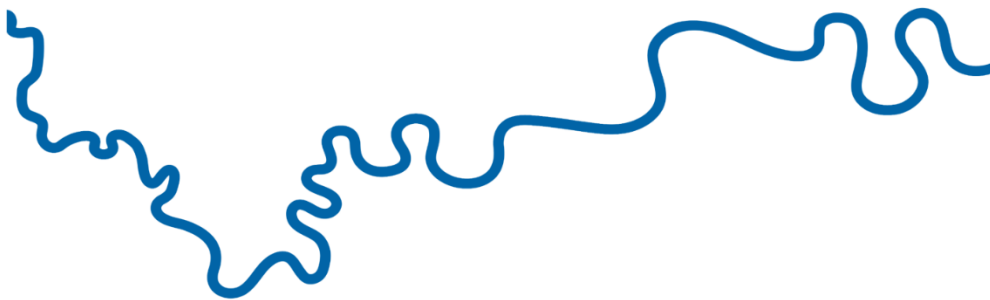
If you have any questions or require more information, please contact my DCO Package Manager Neil Chester at [REDACTED] or Project Consents Lead Zoe Chick at [REDACTED]

Yours sincerely,



**Jeanne Capey**  
**River Thames Scheme - Project Director**

CC. Andrew Mowl, Project Executive



The River Thames Scheme, delivered in a partnership led by the Environment Agency and Surrey County Council, will reduce flood risk for residents and businesses and improve the surrounding area.