

RESPONSE TO TEDDINGTON DRA CONSULTATION : FORCE

Organisation

Email response on 21st August 2025 from FORCE (Friends of the River Crane Environment)
www.force.org.uk

Dear Sirs,

We are writing in response to the Teddington DRA consultation.

Introduction

Friends of the River Crane Environment was formed in 2003 and has Objects to maintain and enhance the community and environmental value of the River Crane corridor in Richmond and Hounslow. We are a very active charity with over 700 members and are delivering many projects, both on our own and in partnership, to support our Objects. We have been members of the Crane Valley Partnership since 2005, and members of both the Mogden Technical Group and the Mogden Residents Group for over ten years.

FORCE has an interest in the Teddington DRA proposals in terms of their impacts on (a) the tidal Crane and (b) the Mogden site.

FORCE submitted a response to previous proposals in December 2023 and this is attached. In the meantime the TW scheme has changed such that (a) the intermediate shafts have been removed from the Crane Valley sites and (b) the overall capacity of the pipeline has increased by a factor of four.

FORCE has been in regular contact with the TW team over the last two years and submitted a further detailed document on the value of the tidal Crane habitat in March 2025. This document continues to be updated on a regular basis and the most recent version (from July 2025) is attached.

FORCE has reviewed relevant parts of the consultation submissions, although we have not looked at everything the detail. We have three significant areas of concern with the proposals on this basis as below.

Aquatic Ecology

The value and sensitivity of the aquatic ecology of the upper Tidal Thames and Tidal Crane is not well understood. Our own understanding continues to evolve as new findings are made. In particular (a) there have been more captures of large sea trout, grey mullet and bass in the upper tideway this summer and (b) the value of the tidal Crane as a spawning habitat, and as a refuge for juveniles of these and other species, is only beginning to be better understood. For example, the tidal Thames

does not yet appear to be recognised as an important habitat for sea trout by the EA and others. Both issues are addressed in our most recent report (as attached).

The Teddington DRA proposals will remove 75Ml/day of secondary treated fresh water sewage input from the Mogden discharge at Isleworth Ait during the periods of least fresh water input to the upper tidal Thames. In other words, the scheme would only operate at the periods of greatest sensitivity to fresh water inflow to this habitat and would remove a significant proportion of this fresh water. Our estimates are that this will typically lead to a reduction of 10 to 15 per cent in the total fresh water input to these reaches. Furthermore there appears to be no control on the minimum freshwater flow limit at which the scheme can operate – and therefore how large an impact the scheme may have during extreme drought events.

The proposals state that “*there are no likely significant effects on aquatic ecology identified once mitigation measures have been applied*”. FORCE has two concerns with this statement:

- We have not seen the evidence that the scheme has adequately addressed the impact of low fresh water inflows to the upper tidal Thames and tidal Crane on the key species – not least because we do not think the value of this habitat (and the limiting factors on this value) for these species have been properly investigated and understood by TW or the EA
- We consider that the objective of the scheme should be to provide some net benefit to the value of the aquatic ecology (particularly through the agreement of mitigation and monitoring measures) rather than the outcome being that it is *unlikely that there are no significant impacts*. Our expectation would be that the EA would also be looking for clear beneficial outcomes through the planning process

We note that, despite pro-actively submitting the documents attached as part of this process, we have had no substantive discussions with the technical team for the DRA around their findings and mitigation proposals regarding these matters.

We have not seen any detailed reporting by TW on the existing monitoring regime or proposed future monitoring for the key habitats we have flagged in this response.

Impact on Mogden STW

One of the key aspects of Mogden STW, that is referred to regularly by TW operational staff, is the lack of capacity – particularly to deal with storm events. As a result the site regularly discharges untreated sewage in to the River Thames and tidal Crane systems and this impacts on the habitat value of these important and sensitive sites. We regularly encounter yellow sewage foam for example when we visit the Northcote tidal creek site.

This scheme will add the footprint of a 75Ml/day tertiary treatment plant to the Mogden site. This will further constrain the capacity of the site to manage the existing sewage throughput as well as the inevitable future growth in sewage and run-off as the upstream catchment continues to be developed. Much of the Heathrow development area for example is within the Mogden catchment. The scheme would also add another level of operational complexity to the site and potentially increase the risk of operational errors and failures – such as the major sewage spillage in early 2023 that badly impacted the Duke of Northumberland’s River adjacent to the site.

We note that the construction footprint is proposed for the existing embankment areas in the western and south eastern area of the works. The Mogden site contains active badger setts and badgers roam throughout this area as far as we are aware. We have seen no information on how the badgers will be impacted, or this impact mitigated, through the works period.

We have not seen the evidence that the scheme has adequately addressed and mitigated the impact on the Mogden site of this proposal, nor considered how the existing problems at the site will be resolved.

Increase in the Operational Capacity of the Transfer Tunnel

The scheme has been amended, such that the size and capacity of the transfer tunnel has been increased by a factor of four, to around 350 MI/day. The scheme at present remains at 75MI/day. However, we are concerned that (a) this increase in operational capacity and (b) TW's contention that there are no significant impacts on the aquatic ecology, leave open the possibility of future applications to significantly increase the size of the scheme.

In Summary

We are concerned about the scheme with respect to the three main areas identified above.

We request that this summary of our concerns is considered alongside the two documents attached.

We remain happy to discuss our concerns with the TW team and other interested parties.