

## **RTS Statutory Consultation (22/01/24-4/03/24)**

### **LOSRA response**

#### **Q9. To what extent do you agree or disagree that the scheme would help to reduce flooding in this area?**

*Answer - disagree*

#### **Q10. Please explain your response to Q9**

*The RTS forecast benefit to the Lower Sunbury stretch of the Thames in terms of reduced river levels in times of flooding is minimal. Given the stated accuracy of the models in the Flood Modelling Non-technical Summary (FMNTS) of  $\pm 0.15\text{m}$  and its admitted variability depending on location, there are good grounds for believing that the outcome at Sunbury could in practice be an increase rather than a decrease in river levels.*

*The FMNTS states that "In most flood conditions, these downstream works give additional reductions in flood risk beyond existing conditions...". The qualification clearly implies that in some circumstances there may be no reduction at all - and possibly, given the stated accuracy of the models, an increase.*

*The increase in water flow at Walton forecast to result from the scheme (380 cu m/s vs 370 cu m/s) in particular fuels the considerable local scepticism that the proposed downstream weir capacity improvements will prove sufficient to reduce flooding. Indeed there are many who believe that Sunbury may experience the same increased water levels suffered by those living in the Datchet/Wraysbury area following the initiation of the Jubilee River.*

*The 380 cu m/s figure appears to be based on a 1 in 20 annual chance flood, "similar to the peak of the 2014 and 2003 observed floods". With continuing climate change there is very little doubt that these levels will be exceeded again within 20 years.*

*A further concern is that the proposed capacity of the two new channels (150 cu m/s) will not be achieved. The Jubilee River was promoted as having a capacity of 215 cu m/s but, we understand, has achieved only 180 cu m/s. The impact of such a shortfall needs to be modelled.*

#### **Q26. To what extent do you agree or disagree with the inclusion of the active travel route?**

*Answer - strongly agree*

#### **Q27. Please explain your response to Q26**

*The benefits of an active travel route (ATR) are self evident. However these benefits are out of reach of Sunbury residents because the towpath along the Thames that is the continuation of the ATR runs on the south bank. A pedestrian/cycle bridge in Lower Sunbury would enable Sunbury residents (as well as those as far east as Hampton) to benefit from the ATR. The lack of a pedestrian/cycle bridge at Sunbury leaves a 6 km stretch of the river without a crossing, the longest gap on the Thames between Chertsey and Tower Bridge.*

#### **Q30. Is there anything else that would make you more likely to use the active travel route?**

*As noted in our response to Q27, the provision of a Sunbury bridge, similar to those proposed upstream, would make a material difference to the attraction of the RTS to Sunbury residents. Without the bridge, residents will be required to cycle along Fordbridge Bridge to reach the ATR -*

*creating a danger to themselves on what is already a very dangerous stretch of road for cyclists. A Sunbury bridge would provide health and social benefits to residents on both sides of the river - and substantially enhance the sustainable travel network in this area.*

**Q33. To what extent do you agree or disagree with the aim to create habitat creation areas as part of the RTS?**

*Answer - Strongly agree*

**Q34. Please explain your response to Q33**

*Whilst the aim is excellent, the reality is that the proposals to achieve it are almost entirely confined to the Egham/Desborough Island stretch. There is no material provision for habitat creation/improvement downstream of Desborough Island.*

**Q45. Bed lowering downstream of Desborough Cut and weirs at Sunbury, Molesey and Teddington**

*Sunbury Weir - LOSRA is very concerned about the visual intrusion of the proposed additional weir on Sunbury Lock Ait, as well as the potential erosion of the north riverbank immediately opposite the new weir. The proposed location is directly opposite Kings Lawn, an iconic section of Thames riverbank, as well as the site of the old ferry house. It is also adjacent to the Middle Thames Yacht Club, giving rise to obvious mooring issues.*

*The new weir complex proposal to include "two to three" weir gates clearly suggests that the RTS is not confident that a two weir solution will be sufficient. Alternative locations need to be explored more thoroughly, including the possible repurposing of the old lock as an additional weir which would have a number of benefits, particularly visual.*

**Q52. Do you believe that the scheme design presented meets the scheme goals?**

*Answer - leave Yes/No boxes blank*

**Q53. Please explain your response to Q52.**

*The RTS claims, in its opening paragraph in the Statutory Consultation Brochure, that it will be "unlocking the economic, health and environmental benefits of the river between Egham and Teddington". This objective is laudable but the reality is that it will only apply to the stretch between Egham and Walton. For those areas further downstream, such as Sunbury and Hampton, the goals will not be achieved. This is because the forecast, minimal, benefit of flood level reductions will be more than offset by the visual intrusion of the new weirs and the elevated concerns of residents that the scheme will, in reality, actually increase the risk of flooding.*

**Q54. Finally, is there anything else you think we should consider as we refine our proposals for the RTS further?**

*As noted above, the RTS claims that it will unlock the economic, health and environmental benefits of the river between Egham and Teddington. The reality is that all of the benefits, including the ATR, are focussed on the Egham to Walton stretch and the forecast benefits to the longer Walton to Teddington stretch are minimal. If the RTS is to be true to its vision it needs to incorporate additional features, such as a Sunbury bridge. In this way the scheme will confer a valuable benefit on communities, on both sides of a significant stretch of the river, that will otherwise see little benefit.*

*Finally, we have to point out that LOSRA's name does not appear in Appendix D: Seldom Heard & Local Interest Groups of the Statement of Community Consultation. We assume that this was an oversight.*

Lower Sunbury Residents Association  
March 2024