

From: Hutchings, Adam [mailto:ahutchings@wandsworth.gov.uk]
Sent: Monday, November 04, 2013 4:57 PM
To: Thames Tunnel
Cc: Manchanda, Seema; Langridge, Robert; Stone, John; McDonald, Tony
Subject: Local Impact Report and answers to the Examination Panel's first set of questions

Dear Sir/Madam,

Please find attached a copy of the Council's Local Impact Report and answers to the first set of questions.

In relation to question S9.1 please find the Council's policy table attached as an appendix to the LIR. The red highlights denote where the Council has provided separate comments to Thames Water's initial draft of the same table. This should be agreed as part of the Statement of Common Ground.

The full text of all local policies is contained in the Core Strategy, Development Management Policies Document and the Site Specific Allocations Document. Please find attached the Core Strategy and DMPD. Due to its large size the SSAD can be viewed via the following link: http://www.wandsworth.gov.uk/downloads/file/5940/site_specific_allocations_document_ssad_adopted_version_february_2012

Please don't hesitate to contact me if you have any matters of clarification.

Kind regards,

Adam Hutchings
Senior Planner
Wandsworth Borough Council
Environment and Community Services Department
Town Hall
Wandsworth High Street
London
SW18 2PU

t: 020 8871 6650
e: ahutchings@wandsworth.gov.uk

Please visit the Council's website at: www.wandsworth.gov.uk

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**Wandsworth Borough Council
Response to the Examination Panel's first set of questions.**

PINS Reference Number: WWW010001

Unique Reference Number: LR15214

Air Quality and Emissions

Q1.1 Can the statutory consultees on matters relevant to air quality and odour detail the extent of agreements reached, noting any areas where the base data is disputed and/or considered insufficient or where the authority disagrees with the conclusions reached in the Environmental Statement (ES).

The control of air quality issues at the sites is to be achieved through the implementation of the Code of Construction Practice (CoCP) Part A and Part B. The Council has not yet agreed the COCP Part B and consider more work will be needed on this prior to implementation and when the actual construction methods are more clearly understood and the contractor is in place. The Council is seeking the right of approval on the final version of COCP Part B.

Odour is to be controlled using the Air Management Plan. Wider issues of air quality impacts are also influenced through the logistics, etc, within the Traffic Management Plan. (For example, the use of Euro VI HGVs and the use of the river for excavated spoil and coffer dam materials). The production of the various management plans and codes of practice follows on from assessments made in the Environmental Statement plus the Statement on Statutory Nuisance.

The CoCPs were produced with the feedback from a number of discussion groups ('EHO Forums') and consultations with the aim of formulating a document representing best practice. Although this has been achieved to a large degree, the details of local control on each site is to be based on an Environmental Management Strategy and associated Environmental Management Plan for each construction site, including an Air Quality Management Plan, to be produced by the approved contractor for that site, to be agreed by Thames Water with the agreement of the local authority, the Environment Agency and others. The Air Quality Management Plan must contain details of the control measures and monitoring details.

The Air Management Plan details the management of the movement of air into and out of the system. Most of the time there is no water entering the system to displace the air/gases entrained within it. During these periods there is continual ventilation provided at each end of the tunnel to keep the system supplied with fresh air. This minimises the build up of odorous gases and reduces the production of odorous substances by avoiding anoxic or anaerobic conditions. Other than the extracting vents at each end of the tunnel, the other vents, including all within Wandsworth borough, act only as inlets not outlets. During certain states of fill of the tunnel during storm overflow events, the local ventilation columns at the CSO sites may emit air displaced from the tunnel. This air is passed through activated carbon filters prior to dispersion from the top of the vent stacks. The possibility for adverse odour impacts is negligible or virtually non-existent. Note that these storm overflow sites already vent into the local air during storm events without the benefit of filtration and we have no record of complaints or problems.

Q1.2 What would be the process for approval of the site specific plans

and how would it be constrained/controlled and managed by the DCO?

It is not clear how the approval by the Council of site specific plans will be processed, but the Environmental Statement and CoCP part A indicates that this will be required. The Council is seeking the approval of the COCP Part B for each site at a time when the contractor is in place but prior to implementation.

Q1.5 What mitigation measures would be available for residential and non-residential properties which are affected by dust and particulates from construction and transportation?

Qs 1.3, 1.4 & 1.5. There are various methods that may be employed to achieve minimal emissions to air from the sites. These are the subject of the detailed site EMS, EMP and AQ Plans to be agreed upon. The Council is seeking the right of approval on these documents.

The CoCP is to be enforced through contractual measures (understood to be financial penalties), and requires the inclusion of sub-contractors activities.

With regard to both the ES (Doc 6.2.02, volume 2, section 4) and the air management plan (Doc 7.14), can the Environment Agency (EA) comment on:

Q1.14 Whether the adoption of the odour benchmark of 1.5ouE/m³ for the 98th percentile of hourly average concentrations is an appropriate standard to assess the odour emissions for an infrastructure of this type.

The use of 1.5ou/m³ as a 98th percentile of hourly average odour concentrations for the assessment benchmark for odour is taken from the Environment Agency H4 odour management guidance for prescribed activities that require Environmental Permits, such as sewage treatment works. These facilities have a much higher likelihood for causing odour impacts as they operate continuously. The potential emissions from the tunnel sites in Wandsworth are intermittent and infrequent, so this benchmark is considered to be more conservative and is appropriate for use for this situation. As noted above (Q1.1), no routine active ventilation is proposed for the CSO sites in Wandsworth, so there are no regular emissions.

Biodiversity, Biological Environment & Ecology

Q2.1 Can Natural England (NE), the EA, Port of London Authority (PLA) and the Marine Management Organisation (MMO), relevant local authorities and other relevant nature conservation Interested Parties answer the following questions:

a) Has the Applicant's Habitats Regulations Assessment No Significant Effects Report provided sufficient information to form the basis of any necessary Appropriate Assessment of the proposals?

Yes.

Compulsory Acquisition and related matters

Design, Landscape and Visual Impact

King George's Park

The representation from the London Borough of Wandsworth (LBW) raises concerns regarding the impact of the flood risk mitigation works at King George's Park.

Q5.9 Can LBW provide details of the reasons for its concerns in relation to this matter?

Thames Water flood modelling shows that the resulting shaft structure would impede water flow levels at times of severe flooding of the river Wandle and consequently the Environment Agency require this effect to be mitigated. The solution proposed by Thames Water involves the excavation of an area of the Park to create a 'sunken garden' to the west side of the shaft head 'terrace' in order to provide a greater cross-sectional area to assist the flow of flood water past the raised area of the shaft head.

The creation of the sunken garden will necessitate a significant change to an open grassed area of the Park that is well planted with fine mature trees. This is currently a very accessible and a particularly attractive part of the Park and it is intensively used for casual recreation. The Thames Water proposals are to excavate approximately 400sqm of this part of the Park to create an area that will be 700mm below the surrounding land. This work will also result in the removal of several mature trees.

The Council considers that the effects of this change would create an area of the Park that is visually less attractive than the existing landscape and less attractive for the public to use for informal recreation. Consequently, the Council considers the loss of the area for recreation unacceptable and has urged Thames Water to identify alternative solutions that would avoid harming the amenities of this important part of the Park.

The changes in the flood extent and flood hazard resulting from the tunnel site (without the flood risk mitigation of the sunken garden) are considered minor resulting in no impact on the hazard rating in the surrounding area (See Environmental Statement paragraph M.2.43 Volume 9).

Although the Council acknowledges that there might be a slight decrease in flood levels as a result of the proposed mitigation in comparison with the baseline figure (without mitigation) the change in the hazard rating remains unaffected. On balance, the Council considers that avoiding harm to the appearance and amenity of the Park should outweigh the very limited benefits to be derived from the flood risk protection measures and the proposed sunken garden should be omitted from the scheme.

The Council is concerned by the lack of public consultation to explain the above points regarding flood risk to the people who use and enjoy the park.

Q5.10 Does LBW have any proposals for mitigating the impact of the proposed works? If so, provide full details and explanation.

The Council has no proposals for mitigating the impact of the proposed works. There is no impact on the flood hazard rating in the surrounding area and therefore considers that mitigation is not required.

Q5.11 On the assumption that LBW's concerns relate to the effect of the works on the character and appearance of the park, can the Applicant provide further information regarding the impact of the proposed re-contouring, including any impacts on trees, and any opportunities for enhancing biodiversity and sustainable drainage and surface water catchment within the park?

The Council's concerns relate to the removal of an area of the park which is a well used public space and replacing this area with a sunken garden which would not be as usable a space for residents as is currently the case.

The Planning Statement identifies that there is an opportunity to create a new character area within the park (F.5.8) and that the permanent works would create a multifunctional area of public space (F.5.11).

Q5.14 Other than the possible provision of a mobile café, what functions does the Applicant envisage being accommodated by the area of hardstanding above the shaft?

The Council was responsible for prompting the design of the hard standing in the form shown because it saw the opportunity to create a new entrance to King George's Park to align with a new route for pedestrians and cyclists that is being provided by the redevelopment of sites to the north of Buckhold Road.

Q5.15 What will the area of hardstanding contribute to the landscape character of the park?

The Council accepts that the Thames Water proposals will result in a noticeable change to the landscape character of this part of the Park. However, the Council has seen the Thames Water proposals as an opportunity to provide a new, improved entrance to the Park that has been designed to align with a new public space on the north side of Buckhold Road that will be provided as part of the redevelopment of two former industrial sites. The public space lies at the southern end of a new route for pedestrians and cyclists from Wandsworth High Street to King George's Park and will include a crossing on Buckhold Road.

This edge of King George's Park is the closest part of the Park to Wandsworth town centre, which has been undergoing considerable change over the last 10 years as a result of a number of substantial regeneration initiatives. The

harmful effect of the hard standing on the landscape character of the Park will be reduced here because this is the interface between the Park and the town centre. The hard standing will have a function as a new element at the gateway to the Park and will be a complementary feature to the new public space on the north side of Buckhold Road.

Development Consent Order Drafting and Related Matters

Q6.1 Is there a consensus between all Parties that the definition and description as currently drafted encompasses all necessary matters and works in a form that allows all parties to understand the fundamental parameters, structure, approach and limitations of the consents sought?

a) if yes please include this in written submissions and/or Statements of Common Ground;

Yes, so far as agreement between Thames Water and the Council.

b) if no please set out what is required and why.

Article 18 Traffic regulations

Q6.21 Could the traffic authority advise if deemed consent set out at article 18(8) is reasonable or necessary? Does this provide adequate safeguards?

It is understood that any requirement under Section 18(2) would require the consent of the traffic authority. It is unreasonable that if the traffic authority had not responded within 28 days of receiving an application it shall be deemed as giving consent. The traffic authority is required to advertise and consult on any such change and seek member approval and this process can not be completed within 28 days. It is suggested that a duration of 8 weeks should be provided prior to deemed consent being made.

There are also items in Schedule 10, which this Council currently does not support in relation to Glendarvon Street.

Article 25 Felling or lopping of trees

Q6.28 How does this article deal with any liability or consents particularly in relation to any protected tree or shrub lying outside the Order limits unless it expressly excludes these works in favour of article 26?

The Council considers that that Article 25 does not make any provision as regards to protected trees outside the Order area but that Article 26 does. However, Article 26 contains some anomalies which require addressing. 26.1 of the Article allows the undertaker to “fell or lop any tree which is subject to tree preservation order with the prior approval of the local planning authority, or may cut back its roots if it reasonably believes it necessary ...”. The phraseology implies that whilst felling or lopping requires prior approval of the

LPA, the cutting of roots does not. Given that cutting of roots is more deleterious than lopping, this is anomalous – and not acceptable. The article also does not address the possible circumstance of the LPA not giving prior approval – unless it is addressed elsewhere.

For any tree in a conservation area it is recommended that Thames Water should be required to seek approval for any works, in the same way that any other person or body would be required. These works will be identified at an early stage and there would appear to be no difficulty in the normal approval processes being put in place. The felling of trees is an emotive issue and following an agreed process would alleviate some of the likely concern.

Article 26 Trees subject to tree preservation orders

Q6.29 Should article 26 also make provision for trees and shrubs protected by virtue of a conservation area designation

The Council would expect Article 26 to make provision for trees in Conservation Areas given that the existing tree protection legislation makes provision for trees in CA to be afforded the chance of protection by TPO.

Article 51 Safeguarding

Q6.51 Could each relevant planning authority provide any commentary on the terms of this article?

Apart from (5)(b) regarding issue of notice rather than receipt (see below answer to Q6.53) the terms seem reasonable. However as the panel indicates in Q6.52 clarification is sought regarding automatic release if the undertaker does not respond to consultation. The Council's position is indicated below.

We approve of the areas to be used solely for safeguarding but would be concerned if the project was using or had the ability to use its safeguarding for purposes other than planning purposes.

In general terms, the approach set out by Thames Water is not dissimilar to the process currently in place in relation to London Underground with respect to their tunnels.

Q6.52 As drafted there is no automatic release if the undertaker does not respond to consultation. Should there be?

Yes, Wandsworth has a track record of prompt decision making and needs to be assured that the very substantial investment in regeneration in Nine Elms is not unreasonably delayed; neither should developments in other parts of the borough.

Q6.53 Should article 51(5)(b) be 21 days from issue of notice rather than receipt which could be a very imprecise measure unless there is also a requirement to acknowledge receipt to determine and fix the time period?.

Issue of notice is preferred by the Council as this is current procedure with planning application consultation.

Article 53 Discharge of requirements

Q6.54 Is deemed consent justified and reasonable? If so how and why?

Deemed consent is considered unreasonable as the Council's determination is crucial to ensure proper consideration of any application or request. Clarification is sought as to what sort of applications and requests Article 53 (2) is referring to. The time period (28 days) is considered inadequate for any potential public or other consultation deemed as necessary.

Schedule 17 Procedure for Discharge of Requirements etc. and Appeals
In relation to 1. and 2.

Q6.66 Schedule 17 1(3) sets out deemed consent. How and why is this reasonable or justified?

The Council objects to Schedule 17 1(3) as deemed consent is considered unreasonable as the Council's determination is crucial to ensure proper consideration of any application with all relevant parties and the public.

Q6.67 Could any of the discharging authorities respond on how reasonable the timescales set out are?

Schedule 17 1 is unreasonable as the 5 week time period given for the Council to determine minor applications is considered unrealistic. Such applications would be consulted upon (3 weeks), validated (can take up to one week+), considered and determined. The Council's current approach for all applications is 8 weeks unless there is a Planning Performance Agreement in place. 8 weeks is therefore required and is considered reasonable. The Council would consider entering into a planning performance agreement with the undertaker and would ask the examining panel to consider whether there is there any scope to be able to have the option of securing a Planning Performance Agreement added to the DCO. This would enable more certainty over the applications to be dealt with regarding determination timescales.

The Council knows of public groups who have expressed a desire to contribute to the detailed design/landscaping approval stage of the application process and a longer timescale for determination would enable adequate time to take into account such input.

Schedule 17 2 (3) (1 business day to issue consultation to required consultee). This timeframe is considered unrealistic as consultation with a requirement consultee would only take place once the application is validated which can take up to one week+.

In relation to fees

Q6.69 Could any discharging authority comment on the adequacy of the charging schedule for discharge?

The charges set out in the schedule are lower when compared to what is required as set out in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. The Council requests that the fees are modified to reflect the current fee structure as set out in the above regulations.

Q6.70 In relation to repayment under 3(3) could the Applicant explain why this is justified if the discharging authority has undertaken a review, in particular if the application is deemed to be invalidly made?

The Council charges a fee for review and determination and not just for a decision and therefore objects to fee refunds in respect to 3(3). Also the Council only validates an application when a fee is received so paragraph (3) (a) would not be in accordance with the Council's current procedures.

Code of Construction Practise (Doc 7.19.1 and Doc 7.19.2)

The DCO Schedule 3, requires that the works be carried out in accordance with the CoCP, subject to site specific amendments, unless otherwise agreed with the relevant planning authority. A number of relevant representations have requested that the CoCP be secured by the DCO.

Q6.74 Can the relevant local authorities and other statutory consultees comment on the CoCP detailing any areas of disagreement and omission.

Site wide

The key noise impact from the operations would be during the construction period. Some residential properties are in close proximity to the Tunnel sites, and the Council is concerned about the effect of potential noise on residential amenity.

Part 6 of the Code of Construction Practice (CoCP) Part A sets out the Section 61 (Control of Pollution Act) 'Prior consent' application process which all contractors must adhere to. The Section 61 process would be agreed by the Council through detailed examination and approval for works at each site.

The DCO requirements set out that works must be in accordance with the CoCP part B, which sets out the specifics. However, the exact form of mitigation is unknown and is not stated within part B.

As the Council does not know what the exact mitigation measures are, uncertainties exist as to what the actual noise effects will be. It is considered that Thames Water has not sufficiently demonstrated options for the mitigation of noise at source. Such mitigation is crucial in helping to prevent a range of alternative scenarios – which the Council deem unacceptable. Such scenarios

include providing mitigation at noise receptors, rehousing, or, in extreme cases, compulsory purchase of affected properties.

The Council understand that the current embedded and further mitigation measures are based on the 'worst case' of predicted noise levels using stated assumptions, but wishes to see noise mitigation at source, mitigated to the maximum extent that is possible. The final draft of the CoCP would need to be agreed as part of the consent order and the Council will continue to discuss the CoCP with Thames Water to achieve optimum solutions that would preferably avoid the need for noise insulation or temporary relocation.

Kirtling Street and Heathwall Pumping Station

Residential properties including Elm Quay Court, Riverlight and the houseboat communities of nine Elms Pier and Tideway Village in Tideway Dock are located within close proximity to the Tunnel site and the Council is concerned about the effect that potential noise would have on residential amenity.

The planning statements for Kirtling Street and Heathwall pumping station imply that the Riverlight development should have mitigated the potential impacts of the Thames Tunnel (7.01, Appendix J, paragraph J.5.123 and 7.01 Appendix K, paragraph K.5.108). This issue is of concern to the Council as when the Riverlight development was granted planning permission the Thames Tunnel project was in the initial phase of consultation and the details of potential mitigation levels were not available. The Council considers Thames Water should provide adequate mitigation at source to avoid the need to implement noise mitigation through improved sound insulation to dwellings or the extremity of relocating residents.

Putney Embankment Foreshore

The Council oppose the use of Glendarvon Street for heavy construction traffic.

Q6.78 In the noise and vibration section, the minimum acceptable control measures are not clearly defined. For example, generic and specific measures are only given as "may" include rather than "shall" include paragraphs 6.4.1 and 6.4.2). Provide clear indication of the control measures.

The Council's preference regarding noise impact is to resolve all noise issues in advance of the consideration of Section 61 consents. Mitigation is not explained in detail as the exact form of mitigation is unknown and therefore an adequate assessment of the noise impact on residential properties cannot be made. As the Council is unaware of what the exact mitigation measures are uncertain exist as to what the actual noise effects will be. The Council considers that Thames Water has not adequately demonstrated or justified how different mitigation techniques may prove to mitigate the noise issue at source sufficiently enough as to not need to consider it appropriate to provide noise mitigation through improved sound insulation to dwellings, rehousing or in extreme cases, through compulsory purchase of affected properties.

Historic Environment

Q8.3 In the event that heritage assets worthy of preservation in situ were identified during field testing, or during the works, what process would be followed to determine and secure the appropriate action?

Much would depend on the nature and size of any undesignated heritage asset found. The action required should be to evaluate the nature of the heritage asset found, seek advice on its merits as to whether it should be designated, formulate a method statement for its repair, conservation and protection in situ. This work would need to be carried out in consultation with English Heritage and the Greater London Archaeological Service.

The representation from the London Borough of Wandsworth (LBW) raises concern about the location of the foreshore structure within the setting of the listed Putney Bridge.

Q8.6 Can the Applicant provide a photomontage or additional 3D representation to assist understanding of the relationship between the proposed CSO interception structure and the arch of Putney Bridge, as seen in close views from the slipway and foreshore (low tide)?

3D images of the proposed foreshore structure and CSO interception structure produced to date have been 'bird's-eye' views. Whilst these are helpful in understanding the three dimensional arrangement of the structures, they do not show what the structures will look like at ground, i.e. eye level.

The proposed CSO Interception structure is located beneath and against the southern arch of the Bridge. Because it is proposed to be attached to the listed building the Council considers that the works will require listed building consent. The CSO structure will be visible, particularly at low tide and there is concern that it would be likely to affect the special character of the listed building.

The foreshore structure will appear in views of Putney Bridge and is considered by the Council to affect the setting of this listed building.

Therefore, it is essential that the applicant provides computer generated images (cgi) to show the proposed CSO interception structure to be located beneath the arch of Putney Bridge that will be visible at low tide from a range of viewpoints. These should include views from the River, the foreshore, the slipway, the Embankment and opposite Fulham bank. In addition, images of the foreshore structure from a range of vantage points will be required in order to assess the effect of the works on the setting of Putney Bridge.

The representation from the London Borough of Wandsworth (LBW) raises concern about the location of the foreshore structure within the setting of the listed Putney Bridge.

Q8.7 Can LBW provide details of the reasons for its concerns in relation to this matter?

The proposed foreshore structure will be located within the setting of the listed Putney Bridge and within the Putney Embankment Conservation Area. The Council is, therefore, concerned that the structure should not harm the setting of the Bridge and the Conservation Area.

Whilst the broad principles concerning the location and shape of the foreshore structure and the location of the CSO are accepted, there are more detailed aspects of the design that are, as yet, unresolved and these could still affect the setting of the Bridge and fail to preserve the appearance of the Conservation Area.

The CSO interception structure, in particular, could appear to be an incongruous addition to the Bridge and Council feels that the preferred design could be improved.

The foreshore structure is a large intervention in a unique and potentially fragile historic context and will inevitably result in a significant change. It is accepted that the foreshore structure offers potential benefits to the public realm. However, great care will be required to ensure that it will be integrated as sensitively as possible with the Embankment and that the benefits it offers can be realised without harm to the special character of the Conservation Area. The Council is concerned, therefore, to seek assurances that Thames Water is committed to delivering detailed design solutions of the highest quality as the scheme progresses.

Q8.8 Does LBW have any proposals for mitigating the impact of the proposed works? How would such proposals be secured within the DCO?

Mitigating the impact of the proposals will largely depend on the quality of the materials and detailed design – see answer to question 8.7 above.

Noise and Disturbance

Noise Survey

The ES methodology for noise and vibration gives the environmental health officers (EHO) forum Position Paper with regards to acoustics (Doc 6.2.02, appendix G1) and the consultation comments and responses (appendix G2).

Q11.2 Can the relevant Local Authorities:

a) detail the extent of agreements reached, noting any areas where the base data is disputed and/or considered insufficient or where the authority disagrees with the conclusions reached in the ES;

Thames Water have supplied base line data which is noted in Appendix G of the ES; 6.2.06, 6.2.07, 6.2.08, 6.2.09, 6.2.11, 6.2.14, 6.2.15. Before the measurements were taken consultation was held with WBC as to locations, time of day and duration were agreed.

The baseline measurements submitted are in accordance with the typical background noise levels expected and the use of these levels for submission and future predictions of noise levels is agreed.

b) advise whether they consider that the dBLAeq, 15min ambient noise levels given in the ES, fully represent the ambient noise level in the areas affected by the works; and

A 15min LAeq is the recognised measurement for this type of noise environment and will represent the ambient noise levels of the construction process.

c) provide full commentary on whether the information provided by the applicant can be used as the base level for the assessment of the impact of noise on residential and other receptors.

Although the base line figures are agreed a lot of the predictions for the noise impact on surrounding residents have not been clarified and calculations have not been submitted. Assumptions on mitigation with TTT have been questioned but thus far not had a response. Some of the noise data has been predicted using BS5228 (2009), this is becoming dated and in some cases will show a worse case rather than modern/quieter technology available to date and may not be truly representative. Notwithstanding that the Council's preference regarding noise impact is to resolve all noise issues in advance of the consideration of Section 61 consents further detail would be expected to be submitted within the Section 61 Application from the contractor before the works commence as suggested within the application stating further works required.

Noise insulation and temporary re-housing policy (Doc 4.1)

Q11.26 Can the relevant local authorities provide a review of the adequacy of the Noise Insulation and Temporary Rehousing Policy with, if appropriate, suggested modifications.

Whilst the Council would not anticipate significant disruption to Council housing residents it should be for Thames Water to clearly identify whether temporary rehousing or upgrade of properties is required or not and this should be done at least 3 months prior to works commencing so that tenants/residents can be either accommodated or works to insulate properties undertaken.

Communication with all local residents during works should be regular and periodic and set out when there is likely to be noise disruption and provide contact details both for liaison officers at Thames Water and for local council environmental health authorities if resident(s) wish to make a complaint. The Council wishes to make clear that it considers Thames Water should provide adequate mitigation at source to avoid the need to implement noise mitigation through improved sound insulation to dwellings or the extremity of relocating residents.

There are a number of points which need clarification if the rehousing policy is considered:

Whilst many residents may be able to deal directly with Thames Water others may well be less confident in terms of form filling and understanding what is available and how they claim. This policy needs to be clearer in respect to what help and assistance is available particularly to more vulnerable local residents in assisting them through any process that might be identified (e.g. rehousing or sound proofing). It is noticed in this respect that the policy does not have an Equality Impact Assessment which is what one might expect.

It is assumed that some form of statement will be made available to local residents and the Council in terms of noise impact. However, what commitments will be given to local residents about their ability to challenge any statement made (in the spirit of transparency and openness?)

The statement does not make reference to other stakeholders who clearly would wish to be informed and involved if remedial or meanwhile works were required to Council residential property. For instance the fitting of double glazing, presumably barriers etc would require direct contact with named officers in the Council if affecting Council owned accommodation.

Where it states that Thames Water would commit to securing buildings if they were temporarily vacated, Thames Water would also need to agree terms of such arrangements with the owners of any of the buildings as well as meeting their commitments to occupants.

Q11.31 How would the noise levels be predicted or measured for each individual receptor in order that the receptor's eligibility for noise insulation can be proactively assessed?

The Council would suggest continuous monitoring at a percentage of properties that have been predicted for noise properties above the insulation level to verify predictions.

Q11.32 what provisions would the Applicant put in place to monitor noise levels within the 300m zone during the construction programme and how would real time data be made available for monitoring, verification and enforcement?

If real time monitoring is installed a feed or log should be made available to the Council for reference/review.

Traffic, Travel and Transportation

Local Highway Authorities

The ES and TA refer in several places to meetings between TfL and the local highway authorities and it is our understanding that the traffic and other data underpinning the ES/TA was sourced from the local highway authorities (or TfL) and/or collected in accordance with methodologies agreed with them.

Q16.5 Could each of the local highway authorities individually or collectively detail the extent of agreements reached, noting particularly any areas where the base data is disputed and/or considered insufficient or where the authority disagrees with the conclusions reached in the ES/TA.

It is correct that several meetings were held between Thames Water and their consultants, TfL and their consultants and the London Boroughs to discuss the development and content of the Transport Assessment. There was also correspondence between Peter Bretts Associates (PBA) and the Council on the choice of survey location and the detailed arrangements for the surveys on the Borough roads. The surveys were detailed in shared documents but in summary they comprised:

- Manual Classified Traffic Counts;
- Queue Length Survey;
- Pedestrian / Cycle Surveys at junctions, stand alone locations and at Thames Path sites;
- Automatic Traffic Counts; and
- Parking Surveys.

PBA also compiled two Risk Assessment and Method Statement (RAMS) documents which were circulated to the Council for comment. While minor changes were requested by the boroughs all of the surveys were undertaken to the satisfaction of all parties.

The Council is not aware of any areas where the base data is disputed and/or considered insufficient. There are a number of outstanding issues in respect to the Transport assessment and these are detailed in the Statement of Common Ground.