

Development and Environment

Planning Inspectorate
Thames Tunnel Sewer Team

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Dear Thames Tideway Tunnel Sewer Team

Thames Tideway Tunnel Development Consent Order (DCO) Adequacy of Consultation

The Mayor considered his response to the DCO Adequacy of Consultation request at his Planning Meeting on 6th March 2013. Please find attached the Mayor of London's response which includes comments from Transport for London and consists of the following documents:

- 1 This covering letter
- 2 The Mayor's Planning Report
- 3 Appendix 1 – Detailed comments relating to points raised in the previous rounds of consultation

The Mayor recognises that there are still a number of issues to be resolved and to be discussed at any Examination of the DCO application. If the application is accepted by the Planning Inspectorate the Mayor will expand on these both through a Local Impact Report and through evidence to the Examination hearings.

Yours sincerely


Kevin Reid
Principal Programme Manager

Thames Tideway Tunnel DCO

in 14 London Boroughs –see below

Adequacy of Consultation

Planning Inspectorate – Development Consent Order application

Adequacy of Consultation

Planning Act 2008

The proposal

Construction of a tunnel (6.5-7.2m diameter) for the collection, storage and transfer of combined sewer overflows (CSOs). The Main tunnel will extend from Acton Storm Tanks (LB Ealing) to Abbey Mills (LB Newham).

The tunnel is proposed to have 24 construction sites. Three of these would be main tunnel construction “drive” sites, these would be large scale construction sites for approximately six years and are proposed at:

- Carnwath Road, LB Hammersmith & Fulham
- Kirtling Street, LB Wandsworth
- Chambers Wharf, LB Southwark

Two main tunnel reception sites are also required, these involve less significant construction works over a period of 3-4 years at:

- Acton Storm Tanks, LB Ealing (also a CSO connection site)
- Abbey Mills, LB Newham

In addition two connecting tunnel drive sites are also required. The Frogmore connection tunnel will be driven from Dormay Street (LB Wandsworth) and is 1.1km long and 2.6m diameter. The Greenwich connection tunnel is 5m diameter and 4.6km long and will be driven from Greenwich Pumping Station (LB Greenwich). This is a large scale operation of a similar order of magnitude to the main tunnel construction sites and is expected to take 5 ½ years, whereas Dormay Street is smaller in scale and expected to last 3 years:

- Dormay Street, LB Wandsworth (also a CSO connection site)
- Greenwich Pumping Station, RB Greenwich (also a CSO connection site)

14 of the sites would be CSO connection only sites. These vary in complexity and whilst smaller than main tunnelling sites are still significant construction operations lasting typically

between three and five years:

- | | |
|--|--|
| <ul style="list-style-type: none"> • Hammersmith PS, LB H&F • Barn Elms, LB Richmond • Putney Bridge, LB Wandsworth • King George’s Park, LB Wandsworth • Falconbrook PS, LB Wandsworth • Heathwall PS, LB Wandsworth • Cremorne Wharf RB K&C | <ul style="list-style-type: none"> • Chelsea Embankment RB K&C • Albert Embankment, LB Lambeth • Victoria Embankment, City of Westminster • Blackfriars Bridge, City of London • King Edward VII Memorial Park, LB T Hamlets • Earl PS, LB Lewisham • Deptford Church Street, LB Lewisham |
|--|--|

Three sites will require modifications to the existing sewage systems, namely:

- Shad Thames, LB Southwark (18 months)
- Bekesbourne St, LB T Hamlets (7 months)
- Beckton, LB Newham (4 ½ years)

The project construction timeframe is proposed to be 2015-2022/3, with many sites working in parallel.

Affected boroughs

The proposals directly affect the following 14 London Boroughs,

- | | |
|----------------------|------------|
| Ealing | Richmond |
| Hounslow | Wandsworth |
| Hammersmith & Fulham | Lambeth |
| Kensington & Chelsea | Southwark |
| City of Westminster | Lewisham |
| City of London | Greenwich |
| Tower Hamlets | |
| Newham | |

The applicant

Thames Water Utilities Limited

Strategic issues

The current requirement is only to comment to the Planning Inspectorate on the adequacy of the pre-application consultation undertaken by Thames Water.

Following receipt of these comments the Planning Inspectorate will determine whether it accepts the Development Consent Order application.

If the Planning Inspectorate accepts the application then the Mayor will submit a Local Impact Report, setting out the impacts of the project and he can also submit further information setting out his views on any aspect of the project, which can be expected to be many and varied.

Recommendation

That the Mayor agrees that this report along with attached schedule of Thames Water responses to the Mayor’s points (Appendix 1) forms his response to the Adequacy of Consultation.

Context

1 On 28 February 2013 Thames Water submitted its application for development consent (known as a Development Consent Order) to the Planning Inspectorate for the Thames Tideway Tunnel. The Planning Inspectorate has 28 days to determine whether the application is valid. Part of that assessment is to ask relevant local planning authorities for their views on the Adequacy of Consultation undertaken prior to submission of the application. For this, the Planning Inspectorate has asked for comments by 14 March, which is the usual 14 day period.

2 The basis of the streamlined Nationally Significant Infrastructure Project planning process is that the applicant undertakes extensive consultation with local authorities and other affected parties prior to submission.

3 In accordance with section 37 of the Planning Act, the applicant must submit a consultation report with the application. GLA and TfL officers have examined the Thames Water Consultation Report within the limitations of the time that has been available.

4 The Consultation Report should set out the applicant's pre-application consultation processes, a summary of the relevant responses to its consultation and how it has taken account of responses received in development of the application. The applicant should have regard to the relevant guidance on pre-application process issued by the Secretary of State and the Planning Inspectorate. The principal guidance on consultation is set out in the following documents:

- The guidance note on pre-application stages – revision 2 (August 2011)
- The Communities and Local Government (CLG) guidance note on pre-application consultation (September 2009)

5 The Mayor has been invited to submit this “Adequacy of Consultation Representation”, under section 55 of the Planning Act 2008, which the Inspectorate must have regard to in deciding whether or not to accept the application. In accordance with the Planning Act 2008 the “Adequacy of Consultation Representation” means a representation about whether the applicant has complied, in relation to the proposed application, with the applicant's duties under sections 42, 47 and 48 of the Act (these parts of the Act are reproduced for reference at Appendix 1.1).

6 An assessment of each formal stage of consultation is provided at sections 10 – 29 of this report. An assessment of the Thames Water response to previous comments, including those that remain outstanding is given in Appendix 1.

7 At this stage in the process the Planning Inspectorate is not seeking comments on the merits or otherwise of the proposals themselves, just on the adequacy of the pre-application consultation.

Consultation Phases

8 Thames Water has developed its proposals over a period of years as broadly indicated in the timeline below. The Mayor has responded to most of these consultations.

Pre phase 1 consultation	up to 2010
Phase 1 Consultation	Sept 2010-Jan 2011
Interim consultation on alternative sites	Spring/summer 2011
Phase 2 Consultation	Nov 2011-Feb 2012
Section 48 Notification	July 2012-Oct 2012

9 GLA and TfL officers have regularly attended the Thames Water local authorities Thames Tunnel Forum which has been held approximately quarterly over the past 4 or so years. GLA and TfL officers have also met with Thames Water officers on numerous occasions to discuss aspects of the emerging proposals and their implications on transport services and infrastructure. Senior officers have also attended a Thames Water chaired High Level Steering Group over the past 18 months.

Pre phase 1 consultation

10 In March 2007 the then Government gave in principle support for the Thames Tideway Tunnel and asked Thames Water to commence work on detailed design, costs and preparation of an application to construct such a tunnel. This Government decision was confirmed with Ministerial statements in September 2010 (and again in November 2011) and with the publication of the National Planning Policy Statement for Waste Water (March 2012) specifically referring to the Thames Tideway Tunnel, it is clear that national Government supports the principle of the project. In 2009 the Government indicated that the scheme could be designated as a Nationally Significant Infrastructure Project to be considered by the then proposed Infrastructure Planning Commission. In the period between 2007 and September 2010 Thames Water issued a number of documents for comment such as the Site Selection Methodology and proposed Community Engagement Strategy. The GLA did not formally respond to these, but responses to some documents were submitted by TfL and the former London Development Agency (whose remaining functions are now subsumed within the GLA). During this period there was regular engagement at officer level over the emerging proposals. The engagement at this stage was generally found to be acceptable and no specific issues were the cause of concern.

Phase 1 Consultation

11 The consultation was launched in September 2010 with an initial deadline of 3 months, which was later extended to Feb 2011.

12 The Mayor of London responded on 14th January 2011 covering the interests of the GLA, LDA, TfL and Crossrail. This response comprised the following five documents:

1. Covering Letter
2. Mayor's Report

3. Mayor's Report Appendix 1 - Detailed comments
4. Mayor's Report Appendix 2 - TfL table of detailed transport implications
5. Mayor's Report Appendix 3 - Crossrail Letter

13 The Mayor's group of organisations are one of a relatively small number of organisations with an interest in all of the specific sites, the general principle and strategic overview of the project and the detailed implications for London's transport infrastructure. Therefore the additional time allowed to respond to this phase of the consultation was welcomed.

14 Officers utilised both the written versions of the documentation and the web-based versions. Given the scale of the project, the sheer volume of material was almost bound to be somewhat daunting. Overall however the documentation was well structured and clear. It was clear that more details, specifically for each site, would be needed to assess the detailed nature of impacts at each site, but given that these were the first formal proposals, the level of information presented was acceptable.

15 During this period Thames Water officers were generally available for any discussion/clarification.

16 It was clear at this stage that the Mayor and TfL would have significant concerns in relation to some of the general project wide aspects, such as protection of transport infrastructure and use of the river Thames, as well as more detailed site specific concerns.

Interim Consultation Spring -summer2011

17 During this period Thames Water undertook further site specific consultation on a range of sites. This was understood to be a reflection of both Phase 1 consultation responses and emerging site opportunities. The GLA did not make any formal response to these consultation exercises.

Phase 2 Consultation

18 The Phase 2 consultation ran from November 2011-Feb 2012 and followed a Ministerial announcement that the Government continued to support the need for a tunnel based solution to address the problems of sewage discharge to the Thames.

19 The Mayor responded to the consultation on the 9th Feb 2012. The response included both GLA and TfL comments and consisted of the following three documents:

- 1 Covering letter
- 2 The Mayor's Planning Report
- 3 Appendix 1 to the Mayor's Report containing detailed comments on the project, the proposed sites and the tunnel route.

20 Again officers utilised both the written versions of the documentation and the web-based versions. In a similar fashion to the phase 1 consultation material, given the scale of the project, the sheer volume of material was somewhat daunting. Overall

however the documentation was well structured and clear. Greater detail was available for specific sites although this still fell short of the level of detail required to fully appreciate some impacts and further clarification would be needed.

21 Some of the strategic issues raised at phase 1 consultation, especially relating to transport implications remained as concerns. Given that the proposals were by this stage becoming more fixed, these concerns began to be more serious. Particular elements are set out in Appendix 1 to this report but can be summarised as:

- The limit on Thames Water liability for damage to transport infrastructure
- Protective provisions for transport assets
- Transport Impact Assessments for each of the sites
- Use of the River Thames for bulk materials transport
- Cost of the proposals and the impact on Thames Water customers

22 The Mayor's response to this stage of consultation included over 200 specific points where changes, further information or clarification were being sought.

23 During this period and subsequent to the phase 2 consultation GLA and TfL officers continued to have regular engagement over a number of issues including detailed discussion over protective provisions for transport infrastructure and a specific working group set up and lead by Thames Water examining the role of water transport.

24 These more detailed discussions were outside the formal Phase 2 consultation exercise. The progress on Transport Assessments (TAs) was slower than had been anticipated and when considering the potential for river transport, the working group on the use of the river faced what in the GLA and TfL's view (as well as the Port of London, we understand) was a restricted view of the viability of river transport.

Section 48 ("s48") Consultation

25 Section 48 of the 2008 Act requires promoters to publicise their proposed scheme, in accordance with details set out in Regulations. Consultation was undertaken from July-October 2012 on the proposals for the s48 requirement. The Mayor responded on 5th October 2012 incorporating responses from both the GLA and TfL. The response constituted the following three documents:

- 1 Covering letter
- 2 The Mayor's Planning Report
- 3 Appendix 1 – Detailed comments relating to the Code of Construction Practice

26 As with previous rounds of consultation, the documentation available was generally clear and understandable, albeit, with such a volume of material it could be somewhat daunting to interrogate.

27 The GLA/TfL had expected that by this stage, detailed material, especially in relation to transport aspects, would be available in time for the assessment of the

specific site implications. This material was not available at that time but was subsequently made available, with the final transport assessment being received in November 2012. Therefore the main thrust of the Mayor's response at this stage was to re-issue the Phase 2 consultation response.

Current position

28 The net effect of the lack of some of the detailed material being provided as highlighted has been that the GLA/TfL has not been able to resolve some of the previously raised concerns.

29 It is to be expected that there would be outstanding issues on a project as large and complex as the Thames Tideway Tunnel, some of those issues are significant. An explanation of the significance of key issues is given below. TfL and GLA will examine these if the Planning Inspectorate accept the proposals but in the main they relate to issues which have previously been raised:

- The limit on Thames Water liability (in the case for example of a major impact on transport assets)
- The measures to ensure adequate protection, monitoring etc of transport infrastructure
- Enabling Works
- Transport Strategy/use of the River Thames
- Transport Assessments
- Project Costs
- Duration of construction works

Capping of liability

30 Thames Water wishes to 'cap' its potential liability, should the construction and / or operation of the Thames Tideway Tunnel impact adversely on other infrastructure / services. This is a key concern for GLA /TfL during both the construction and operation phases of any tunnel. The potential damages, in a worst case scenario such as damage to a tube tunnel, are impossible to quantify but certainly extremely expensive and could result in injuries or even fatalities.

31 TfL met with Thames Water on Friday 1 March to discuss this issue, and it is hopeful some progress can be made. The 'funding statement' which Thames Water submitted as part of its DCO application makes clear that the funding arrangements for the Project are still to be finalised with Ofwat and Defra, and the issue of liability will form part of these arrangements. Until a resolution is reached, the Mayor's position is that any capping of liabilities by Thames Water is unacceptable. The financial risks associated with this cannot be expected to be borne by London's tax payers and or / public transport fare payers, and Thames Water/tunnel construction companies' liability should not be subject to, or constrained by Thames Water's own arrangements with funders.

Protection of Transport Infrastructure

32 In order to manage and mitigate the risk of damage to transport assets, protective provisions and requirements, including monitoring and physical protection in and around transport assets is required. TfL and Thames Water have been engaged in extensive legal negotiations in terms of 'protective provisions' and an overarching agreement. An 'Interface' schedule and plans have been produced to assist with legal agreements. Discussions are however still ongoing in relation to some aspects, for example, in terms of specific requirements at each work site and land ownership at some specific sites. It is our view that these arrangements should be clearly agreed prior to any tunnel scheme gaining permission.

Enabling Works

33 TfL understands that Thames Water is currently scoping out what are referred to as 'category 2' works which do not form part of the DCO submission. These will include the enabling works required to facilitate the main works, e.g. utility diversions. Such works may be expected to be undertaken as early as 2015 and Thames Water has said that it is preparing a paper which details the programming of such works which they should be able to share with TfL in March 2013. Road works required for any such 'enabling' works will need to be subject to existing highway laws, such as the New Roads and Street Works Act and the Traffic Management Act, and TfL is looking forward to belatedly receiving further details from TWUL in March 2013.

34 Such works could have significant wider impacts, for example on the highway network through roadworks. The scale and scope of these works is currently unknown and therefore may or may not be acceptable. The status of these works is not currently clear as they may be essential for the construction of the DCO works.

Transport Strategy/Use of River Thames

35 The Mayor's responses to the pre-application consultation and officers input to various studies and meetings sought to secure the maximum reasonable use of non road methods of transport. The potential for both river and rail opportunities needed to be worked through in detail. However as mentioned above these processes were sometimes difficult with what TfL and GLA officers felt was a determination to find reasons for not using these modes, water in particular, within an acceptable cost margin. In particular the view of costs has been taken in a fairly limited sense to those directly affecting the project, rather than the wider socio-economic costs. It remains the Mayor's view that the current proposed transportation logistics is sub optimal and should be able to increase the use of the river and possibly rail modes.

Transport Assessments

36 The Transport Assessments were not available in time to be properly reviewed as part of the s48 consultation. All 'draft' TAs have now been assessed and discussed at workshops in November 2012. Comments on the drafts however did not lead to a re-issue of the TAs. Therefore the first sight of Thames Water's response to comments raised on the TAs will be through the material submitted as the DCO application. Therefore there can be no assessment at present as to how well, or otherwise, those comments have been taken into account.

37 TfL will need to be assured that the effects of the construction of the tunnel on the transport network, and on *all* transport users is acceptable. Any adverse effects should be (within reason) mitigated by the insertion into the DCO of protective provisions acceptable to TfL and the securing of appropriate undertakings and agreements in relation to key issues of concern to TfL. It is important that appropriate strategic and local traffic modelling has been completed to inform the overall Transport and Environmental Assessments being undertaken by the scheme promoter.

Project Costs

38 The project is clearly expensive and these costs will be passed on to Thames Water customers, many of whom are Londoners. The additional costs will be a significant burden to lower income households and the Mayor is concerned that any cost over-runs are not borne by Thames Water customers. This point is further emphasised by the need to remove any capping of liability as set out in paras 30-31 above.

Duration of Construction Works

39 It is inevitable that such a large and complex tunnelling project will take some time to deliver. In some cases the duration of works is expected to be over 6 years. This will have significant impacts on many communities around London. There must be strict measures in place to control those impacts, as detailed in specific comments raised by the Mayor through the consultation and by many others. There must also be good project planning to ensure that any delays or extensions to construction duration are minimised and good communication methods are established with effected communities.

Public Correspondence

40 There has been a good deal of public interest in the project and inevitably a good deal of concern at the particular construction sites identified. It is to be expected that this interest will be heightened again with the submission of the DCO and again if the Planning Inspectorate accept the application, which should be known on or before 28th March 2013.

Local planning authorities' positions

41 As yet unknown for some affected boroughs, however some boroughs have raised concerns about the principle of the project, notably Hammersmith & Fulham. Other boroughs are known to have raised concerns about particular sites, again Hammersmith and Fulham and also Southwark and Tower Hamlets. London Councils have also responded to previous consultations, providing a balanced viewpoint reflecting a lack of a consistent line between boroughs.

Legal considerations

42 The Mayor supports the principle of a Thames Tideway Sewer Tunnel Project as set out within Policy 5.14 of London Plan.

43 The Mayor's comments at this stage will be a formal response to the Planning Inspectorate in respect of the Adequacy of Consultation Representation ("Representation") under section 55 of the Planning Act 2008. This Representation focuses on whether the applicant has complied, in relation to the proposed application, with the applicant's duties under sections 42, 47 and 48 of the Act (reproduced for reference at Appendix 1.1).

44 The Planning Inspectorate must have regard to these Representations in deciding whether or not to accept the application.

Financial considerations

45 There are no financial considerations, save as mentioned in paragraph 30 above at this stage. TfL will seek to recover as much of its planning costs as possible from TWUL, under the Memorandum of Understanding (MoU) which both parties have signed. Note that TfL is unlikely to be able to recoup all its costs, particularly if it is put in the position of having to object/make representations on the DCO application in order to protect its position.

Appendices - Appendix 1 Contains a summary of GLA/TfL consultation comments, along with a Thames Water summary response to those comments.

for further information, contact Planning Decisions Unit:

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Section 11 Acton Storm Tanks			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
11.6.5 page 27	The preferred site is more suitable than any alternative sites. In particular, the alternatives suggested would require the relocation of existing business premises.	This is a positive or neutral comment so no response is required.	
11.6.7 page 27	Support for changes in extent of preferred site since phase one consultation specifically because the impacts are reduced through the use of the northern end of the site.	This is a positive or neutral comment so no response is required.	
11.6.9 page 28	Proposals will ensure that odour is satisfactorily managed	This is a positive or neutral comment so no response is required.	
11.6.12 page 29	<p>GLA recommended the implementation of the GLA's and London Council's Best Practice Guidance BPG "The control of dust and emissions from construction and demolition".</p> <p>GLA required the issue of existing odour problems on the site to be addressed.</p>	<p>TW set out measures for managing the construction, which are in line with the best practice and has been developed in consultation with LBE in the <i>CoCP</i>. While the effects of dust and emissions are considered in the environmental impact assessment in the <i>Environmental Statement</i>.</p> <p>TW stated that any existing odour would be addressed through hydraulically isolation and infrequent use of the remaining storm tanks. Any uses would be very diluted with lesser odour.</p>	
11.6.14 page 30	GLA raised the concerns regarding the proximity of construction sites to residential properties.	TW set the likely significant effects on residential amenity are considered as part of the environmental impact assessment in the <i>Environmental Statement</i> .	
11.6.15 page 31	GLA raised the concerns regarding the scale and the assessment of the transport effects on the surrounding highway network including The Vale (A4020).	TW set the transport effects including the lorry and cumulative effects of the works with other strategic developments in the local area has been considered in a full <i>Transport Assessment</i> . The report has	

		been prepared based on a methodology agreed with LBE and TfL.	
11.6.19 page 32	GLA recommended the construction related impacts at all available stages to be minimised.	TW set out measures for managing the construction, which is in line with the best practice and has been developed in consultation with LBE in <i>CoCP</i> . The environmental effects have been considered and the findings are presented in the environmental impact assessment in the <i>Environmental Statement</i> .	
11.6.20 a,b page 33	GLA suggested considering options for further use of spoil to infill the last four storage tanks and using the storm tanks to store surface water.	TW stated that the storm tanks are requires for extreme events and therefore are not available for infill.	
11.6.20 c page 33	GLA also suggested accommodating the requirements of the Counter Creek sewer flooding alleviation scheme to avoid any abortive work and the need to revisit and amend the site at a later date.	TW noted that the Counters Creek flood alleviation works is a separate project and the decision has not been made.	
11.6.22 page 34	GLA requested for details of how the site can be brought forward for development upon competition.	TW stated that the proposed site would remain as an operational site. The future use of tanks would be determined by TW. There are currently no proposals for the redevelopment of this site.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.17	Ensure that the location and design of the ventilation plant minimises any noise/odour impacts on nearby residents (points from TWUL relate to odour and residents but not design or location of the ventilation plant).		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		

Section 12 Hammersmith Pumping Station

Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
12.6.5page 21	The preferred site is more suitable than any alternative sites.	This is a positive or neutral comment so no response is required.	
12.6.11 page 22	GLA raised concerns regarding the compatibility with the existing planning permission adjacent to/in the vicinity of the site.	TW developed the proposals with St George PI, who will be responsible for implementing the consented development, and reach an agreement to ensure the works on both projects would proceed concurrently.	
12.6.12 page 22	GLA raised the concerns regarding the proximity of construction sites to residential properties, commercial premises and public open space.	TW set out the details of site management measures in <i>CoCP</i> . The likely significant effects were considered as part of the environmental impact assessment and reported in the <i>Environmental Statement</i> .	
12.6.13 page 23	GLA raised the concerns regarding the construction traffic exacerbating the existing traffic congestion.	TW set the transport effects including the lorry and cumulative effects of the works with other strategic developments in the local area, which has been considered in a full <i>Transport Assessment</i> . The report has been prepared based on a methodology agreed with LBE and TfL.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
12.6.15 page 23	GLA raised the concerns regarding the provision of Thames Path diversion.	TW stated that the Thames Path will not be affected by the proposed works.	
12.6.16 page 24	<p>GLA required ensuring that the location and design of the ventilation plant minimises any noise-odour impacts on nearby residents.</p> <p>GLA also required ensuring that the design and location of any facilities to support river transport should be designed in such a way that they have a purpose following construction such as river transport or river-sport recreation.</p> <p>GLA also suggested that an improved Thames Path and public realm should be reinstalled.</p>	<p>TW set the details on how the odour will be managed in the <i>Air Management Plan</i>, while the <i>Environmental Statement</i> identifies that no likely significant operational noise and vibration effects are predicted during operation.</p> <p>TW does not propose any works to the river Thames Path.</p>	

GLA Issues Unresolved from earlier phases	
Phase 2 Consultation Response p.18	Standard issue of lack of facilities to support the use of river for transport not addressed specifically at this site.
Phase 2 Consultation Response p.18	Include the shared use of any river transport facilities with neighbouring development
Phase 2 Consultation Response p.18	It is likely that 2.4m acoustic screens be recommended for site boundaries close to residential properties
Phase 2 Consultation Response p.18	The design and location of any facilities to support river transport should be designed in such a way that they have a purpose following construction such as river transport or river sports/recreation.
Phase 2 Consultation Response p.18	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.
Phase 2 Consultation Response p.18	The design of finished Pumping Station and boundary wall appears bland and needs to be improved.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site

Section 13 Barn Elms			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
13.6.5 page 58	Support the use of proposed site.	This is a positive or neutral comment so no response is required.	
13.6.7 page 58	Design [proposal should be in keeping with and blend into the character of the local area/minimise visual impact.	This is a positive or neutral comment so no response is required.	
13.6.12 page 61	GLA highlighted the need to minimise the lost of open space and utilise temporary construction sites for the minimum period possible.	TW developed a design that minimise the lost of open space and provides details in the <i>Open Space Assessments and Planning Statement</i> .	
13.6.16 page 62	GLA highlighted the issue of a temporary loss of public open space as unacceptable.	TW stated to seek to reconfigure the playing fields to minimise the potential loss of playing pitches. The <i>Open Space Assessment and Planning Statement</i> provide further details.	
13.6.21 page 64	GLA required the re-instalment of the open space and recreation mitigation to be consistent with aims and objectives of the <i>All London Green Grid</i> .	TW stated that the re-instalment of the open space is shown on the <i>Landscape Plan</i> , while the <i>Planning Statement</i> details conformity of the proposal with planning policy, including the <i>All London Green Grid</i> .	
13.6.22 page 65	GLA raised the concerns regarding the proximity of construction sites to residential properties.	TW set out the details of site management measures and measures to mitigate the effects of development on residential in the <i>CoCP</i> . The likely significant effects were considered as part of the environmental impact assessment reported in the <i>Environmental Statement</i> .	
13.6.23 page 65	GLA required providing an alternative construction traffic route to and from the site as it is undesirable to have the Embankment Thames Path used for any intensive lorry movements.	TW provided an alternative site access as shown in the <i>Access Plan</i> . The Thames Path will not be used for lorry movements at this site.	
13.6.24 page 66	GLA required ensuring that the Thames Path	TW stated that the Thames Path will not	

	remains open with minimal disruption. Vehicular access to the boathouse must also be maintained and arrangements included enabling bathhouse traffic to cross the site access road to a convenient point. Assurances are sought from Thames Water that they would not encroach or block the Beverly Brook path. It is proposed that the boundary of the “limits of land to be acquired or used” should be relocated to allow continued use of the footpath, or an alternative temporary access provided in agreement with the Council.	be affected by the proposed works. TW also confirmed that the vehicular access to the boathouse will be maintained. The <i>CoCP</i> includes a requirement for the contractor to provide a <i>Traffic Management Plan</i> to manage construction traffic around the site. TW also showed the extend of the construction site and its relationship with the Beverly Brook footpath in the <i>Site works Parameter Plan</i> .	
13.6.25 page 66	GLA recommended minimising the construction related impacts at all available stages.	TW set out measures for managing the construction in line with the best practice in the <i>CoCP</i> , which has been developed in consultation with LBR. The environmental effects have been considered and the findings are presented in the <i>Environmental Statement</i> .	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.19	Standard issue of lack of river for transport not addressed specifically at this site.		
Phase 2 Consultation Response p.19	Design of the permanent structures need to be sympathetic to their setting		
Phase 2 Consultation Response p.19	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
Phase 2 Consultation Response p.19	An improved Thames Path and public realm should be re-instated		
Phase 2 Consultation Response p.19	Thames Water should liaise with school playing field users to identify the re-instatement requirements should be of the site.		
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to consult TfL (London Buses)/Borough and get approval for final arrangements		

Section 14 Putney Embankment Foreshore			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
14.6.6 page 71	Support for the temporary slipway that will be installed, given the prominence of river sports at this location.	This is a positive or neutral comment so no response is required.	
14.6.8 page 71	Proposal will ensure that odour is satisfactorily managed.	This is a positive or neutral comment so no response is required.	
14.6.13 page 74	GLA raised the issue regarding the effects of changes to the site boundary since phase two consultation need to be agreed with TfL in respect to any impact on LRSL operation using Pier.	TW discussed the issue with TFL throughout the pre-application stage. The risk assessment and mitigation measures associated with the proposed permanent and temporary structures within the River Thames have been considered in the <i>Navigational Issues and Preliminary Risk Assessment</i> .	
14.6.15 page 74	GLA recommended erecting a site hoarding including the 2.4m high acoustic screens on the site boundaries close to residential properties.	TW confirmed that the 2.4m high acoustic screens would be erected.	
14.6.16 page 75	GLA raised an issue regarding the effect on river navigation and recreational river users.	TW stated that the risk assessment and mitigation measures associated with the proposed permanent and temporary structures within the River Thames have been considered in the <i>Navigational Issues and Preliminary Risk Assessment</i> .	
14.6.18 page 75	GLA raised the concerns regarding the proximity of construction sites to residential properties	TW set out measures for managing the construction, in line with best practice which has been developed in consultation with LBW and published in the <i>CoCP</i> . The likely significant effects were considered as part of the environmental impact assessment reported in the <i>Environmental Statement</i> .	
14.6.20 page 76	GLA raised the concerns regarding the disruption to the use of the Thames Path caused by	TW has carefully considered the possible options for the temporary diversion of	

	construction works or diversion.	the Thames Path and cycle path while developing the proposals. The proposed route is considered to be the best option of the temporary diversion and it is illustrated in the <i>Construction Phase Plans</i> .	
14.6.21 page 76	GLA raised the concerns regarding the construction traffic causing the congestion.	TW considered the transport effects of lorry and barge transport as well as parking and cumulative effects in the local area and this has been presented in a full Transport Assessment. The report has been prepared based on a methodology agreed with LBW and TfL.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
14.6.22 page 77	GLA raised the concerns regarding the use of local roads by construction vehicle and sees them as an unsuitable.	TW prepared the <i>CoCP</i> , which provide a requirement for the contractor to produce a <i>Traffic Management Plan</i> to manage construction traffic around the site.	
14.6.25 page 78	GLA required seeing the effect of proposed access route to the site on local bus services and location of bus stops.	TW presented the effects of construction traffic on bus routes and patronage in the <i>Transport Assessment</i> . TW also highlights that the current proposal will have no effect on the westbound bus stop on Lower Richmond Road. While the closure of the eastbound bus stop required for duckwork installation along Lower Richmond Road footway will last for a maximum of two months.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
14.6.26 page 78	GLA raised the concerns regarding the effect of construction on the passengers' pier. The river bus service, which is expected to increase its operation frequency in the near future, must also remain uninterrupted both during the Thames Tunnel construction period and post completion.	TW stated that the risk assessment and mitigation measures associated with the proposed permanent and temporary structures within the River Thames have been considered in the <i>Navigational Issues and Preliminary Risk Assessment</i> .	
14.6.28 page 78	GLA recommended minimising the construction related impacts at all available stages.	TW produced the <i>CoCP</i> , which sets out measures for managing the construction in line with the best practice and has been developed in consultation with	

		LBW and plan London stakeholders. The environmental effects have been considered and the findings are presented in the <i>Environmental Statement</i> .	
14.6.32 page 81	GLA raised the concerns regarding the proposal impact on the appearance of the local area and character of the river embankment.	TW stated that the design proposals for this site were developed during the pre-application process and responded to comments raised by PLA, LBW and others. The <i>Heritage Statement</i> explains how the design of the works has been influenced by nearby heritage assets, and the <i>Environmental Statement</i> assesses any potential impacts on the setting of any other heritage assets.	
14.6.34a page 82	GLA suggested locating the electrical and control kiosk into the disused vaults.	TW considered the second electrical and control kiosk in the vaults of the arches on Lower Richmond Road, however this would affect existing development proposal.	
14.6.34b page 82	GLA suggested reviewing the location and configuration of the structure to take accounts of concerns about shape, scour and rubbish collection and the opportunity to supplement the amenity of the embankment at very little additional cost. GLA also suggested that the revision should take into account the Council's proposal to	TW stated that the design proposals for this site were developed during the pre-application process including a curved external edge design of the permanent foreshore structure to improve the flow of water around the structure to reduce scour and mitigate against debris collecting. The details of the proposed design are set out in the <i>Design and Access Statement</i> and the <i>Engineering Design Statement</i> , and shown on the <i>Site Works Parameter Plan</i> and the <i>Permanent Layout Plan</i> in the <i>Book of Plans</i> , which includes proposal for a curved external edge design of the embankment. TW discussed the intention to pedestrianise a section of the Embankment with LBW and concludes	

	pedestrianism a section of Embankment between Lower Richmond and Thames Place.	that the works would not prejudice these proposals coming forward upon competition of the construction works.	
14.6.34c page 83	GLA suggested that the configuration of the permanent structure be elongated to better accord with the linear nature of the embankment and, to extend possible, narrowed to minimise the degree of protrusion into the river. This could be partially achieved by demolishing part of the existing river wall and taking the structure about 2m into the existing footpath. The additional space formed would provide a riverside boulevard, a focal point for relaxation, entertainment and refreshment.	TW considered configurations of the permanent foreshore structure further inland. However, due to the engineering requirements of the shaft height; this would result in a visual unfavourable level difference along the Embankment. In addition, we have sought to avoid the demolition of the large trees along the Embankment and river wall.	
14.6.34d page 83	GLA suggested regarding the deploying the structure curve to marry with the existing embankment in order to ensure that adjoining water is flushed on a regular basis and that any possibility of scour is minimised.		
14.6.34e page 83	GLA disagreed regarding the infilling a portion of the river is likely to be a solution to the accumulation of rubbish. If rubbish is left to be a possibility then alternative arrangement for mitigation this should be found. It is not acceptable to encroach further into the river for this reason.		
14.6.34f page 84	GLA suggested making provision for mooring of leisure vessels.	TW proposed vertical and horizontal fenders to provide additional temporary moorings and secure recreational and ecological benefits.	
14.6.34g page 84	GLA suggested enhancement opportunities in the area in the form of the removal of rip rap on the foreshore surrounding the existing apron.	TW proposed interception chamber, which will result in the removal of the existing concrete apron and subsequently rip rap. TW will reinstate the rip rap around the replacement concrete apron to protect Putney Bridge and the permanent foreshore structure.	
14.6.34h page 84	The location and the design of the ventilation plant should ensure that any noise-odour impacts	TW identified in the <i>Environmental Statement</i> that there are no likely	

	on nearby resident are minimised; An improved Thames Path and public realm should be re-installed with suitable re-installment of the river access facilities slipway should be provided following liaison with river users.	significant operational noise and odour effects. TW committed to make provision for reinstatement of the Thames Path and the re-installment of the slipway as detailed on the <i>Permanent Works Layout Plan</i> in the <i>Book of Plans</i> . TW also south feedback of the proposals from river users throughout the pre-application process.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.20	Re-examine the quantity of materials being transported by barge.		
Phase 2 Consultation Response p.20	It is likely that 2.4m acoustic screens be recommended for site boundaries close to residential properties		
Phase 2 Consultation Response p.20	An improved Thames Path and public realm should be re-instated		
Phase 2 Consultation Response p.20	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to consult TfL (London Buses)/Borough and get approval for final arrangements		

Section 15 Dormay Street			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
15.6.5 page16	Support use of the proposed site subject to suitable arrangements being put in place with LBW to manage the impacts on the LBW Depot.	This is a positive or neutral comment so no response is required	
15.6.9 page18	GLA required determining the effect on business operation.	TW engaged with LBW to ensure that the construction works do not have impacts on the operations of their existing maintenance depot. An assessment of likely significant impact on the residential amenity and socio economic effects is set out in the <i>Environmental Statement</i> .	
15.6.10 page18	GLA raised the concerns regarding the construction traffic impact on the A217.	TW considered the transport effects of lorry and barge transport as well as cumulative effects of the works with other strategic developments in the local area and this has been presented in the full <i>Transport Assessment</i> . The report has been prepared based on a methodology agreed with LBW and TfL. TW confirm that the details of the works that are required are set out in the application.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
15.6.11 page18	GLA also required details of any works to the strategic route network and junction to be agreed with TfL and where appropriate with the borough.		
15.6.12 page19	GLA raised the concerns regarding the agreement with TfL on the modifications to the design of the Dormay Street-Armoury Way junction.	TW confirmed the discussion with TfL regarding the proposed scheme as part of the pre-application process. Following further discussions with TfL and LBW on the proposals at this location, it is no longer proposed to modify the junction between Dormay Street-Armoury Way.	

15.6.16 page20	GLA recommended minimising the construction related impacts at all available stages.	TW set out measures for managing the construction which are in line with the best practice and have been developed in consultation with LBW and has been published in the <i>CoCP</i> . The environmental effects have been considered and the findings are presented in the environmental impact assessment in the <i>Environmental Statement</i> .	
15.6.18 page21	GLA noted that some indication has been given to the after use of construction site, these aspects should be kept under review to reflect needs and opportunities as they appear on the completion of works, which in some cases will be 10 years from now.	TW liaised with LBW to ensure that the design and location of our permanent works are compatible with the operation of the maintenance dock. TW also positioned the works to safeguard the future provision of a riverside walkway along Bell Lane Creek.	
15.6.19 page21	GLA recommended working with site developers to accommodate Thames Tunnel and future developments.	TW discussed the proposal for permanent works with LBW to ensure that the use of the existing maintenance depot can continue whilst also safeguarding the future provision of a 4m wide river walkway along Bell Lane Creek.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.22	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works		

Section 16 King George Park			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
16.6.5 page24	Support the use of proposed site. Reasons included that no site is thought to be readily available that would cause fewer impacts.	This is a positive or neutral comment so no response is required.	
16.6.6 page24	The creation of a new entrance at the northern apex of the park is broadly acceptable with the proviso of the mature Red Oak being protected and retained. This entrance should provide for pedestrian access as well as a vehicular entrance for Thames Water maintenance purpose	This is a positive or neutral comment so no response is required.	
16.6.10 page26	GLA raised the concerns regarding the loss of trees arising from the construction activities.	TW confirmed that the trees that will be lost as a result of the works will be replaced with semi mature and specimen trees as set out in the indicative <i>Proposed Landscape Plan</i> .	
16.6.11 page27	GLA recommended erecting a site hoarding including the 2.4m high acoustic screens on the site boundaries close to residential properties and to protect park users.	TW detailed the site management measures to control the effects of the construction works which are set out in the <i>CoCP</i> , including the 2.4m high acoustic screens.	
16.6.13 page28	GLA raised the concerns regarding the proximity of construction sites to residential properties.	TW set out measures for managing the construction, which are in line with best practice which has been developed in consultation with LBW and are published in the <i>CoCP</i> . The likely significant effects were considered as part of the environmental impact assessment reported in the <i>Environmental Statement</i> .	
16.6.14 page28	GLA required clarification on the scale of	TW considered the transport effects of	Project wide issue of Transport

	transport effects from construction vehicles using the adjacent TLRN Wandsworth one way system.	lorry transport as well as cumulative effects of the works with other strategic developments in the local area and this has been presented in the full <i>Transport Assessment</i> . The report has been prepared based on a methodology agreed with LBW and TfL.	Assessments and issues still outstanding to be resolved.
16.6.15 page28	GLA raised the concerns regarding the construction traffic causing the congestion on the TLRN.		
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.21	Investigate opportunities to reduce road distances; potentially by using consolidation centres at nearby barge/rail served sites should be investigated.		
Phase 2 Consultation Response p.21	Thames Water should liaise with LB Wandsworth and park users to determine a good quality re-instatement of the park and public realm		
Phase 2 Consultation Response p.20	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		

Section 17 Carnwath Road Riverside			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
17.6.5page 38	Support the identification of a new preferred site since phase one consultation/ the preferred site is more suitable than the site put forward at phase one consultation. This is because it relocates major tunnelling activities from a Greenfield to a partially derelict Brownfield site and increases the viability of barge transport by using a currently vacant safeguarded wharf.	This is a positive or neutral comment so no response is required.	
17.6.6 page 38	Mitigation proposed to address air quality and odour issues is satisfactory. In particular the shaft and crane within a building is welcomed, subject	This is a positive or neutral comment so no response is required.	

	to ensuring that it meets the noise, dust etc requirements.		
17.6.20 page 45	GLA raised a concern regarding the effects on health arising from dust, odour, and air pollution and reduced air quality.	TW referred to the <i>Health Impact Assessment</i> that examines the likely significant effects on the proposed development on human health and well being and possible effects in the population.	
17.6.23 page 46	GLA raised a concern regarding the effects on a safeguarded wharf.	TW stated that this comment was originally submitted in response to phase two consultation. The proposals of this site have been designated to minimise the likely significant effect on the safeguarded Hurlingham Wharf as described in the <i>Planning Statement</i> .	
17.6.27 page 47	GLA raised a concern regarding the proposal impact on local regeneration including the loss of potential development at Whiffen Wharf.	TW designed the permanent layout and design of the site to minimise the amount of land that is needed permanently, allowing as much of the site as possible to be redeveloped, as detailed in the <i>Planning Statement</i> .	
17.6.30 page 48	GLA required providing alternative business premises.	TW highlighted that the local authority has allocated Carnwath Road Industrial Estate for redevelopment in its local development plan documents, which will require the subsequent relocation of existing businesses even without Thames Tunnel proposal. The <i>Environmental Statement</i> sets out provisions for relocating businesses in Vol 10. TW also published <i>A guide to the Thames Tunnel compensation programme</i> that sets out details of compensation policies that would be available during construction for damage or loss, required protection measures, and compulsory purchase.	
17.6.31 page 48	GLA required seeing the effect of proposed access route to the site on local bus services and location	TW stated that the current proposals do not require relocation of any bus stop.	Project wide issue of Transport Assessments and issues still outstanding

	of bus stops.	TW presents the likely significant effects of construction traffic on bus routes and patronage in the <i>Transport Assessment</i> .	to be resolved.
17.6.32 page 49	GLA raised the concerns regarding the effect of construction traffic on residential amenity.	TW confirmed that proposals at this site propose to use barges to transport majority of excavated materials from the shaft and tunnel which will reduce the number of lorries on local roads. The effects of the proposed construction traffic are considered in the <i>Transport Assessment</i> .	GLA feel there is the potential to increase use of the river still further and will continue to discuss this with TW and the PLA.
17.6.35 page 50	GLA required the <i>CoCP</i> to include references to highway works associated with the site proposed at Wandsworth Bridge Road/Carnwath Road junction.	TW confirmed that the references to highway works are included in the <i>Transport Statement</i> .	
17.6.39 page 51	GLA raised the concerns regarding the permanent business relocation associated effects.	TW highlighted that the local authority has allocated Carnwath Road Industrial Estate for redevelopment in its local development plan documents, which will require the subsequent relocation of existing businesses even without Thames Tunnel proposal. <i>The Environmental Statement</i> sets out provisions for relocating businesses. TW also published <i>A guide to the Thames Tunnel compensation programme</i> that sets out details of compensation policies that would be available during construction for damage or loss, required protection measures, and compulsory purchase.	
17.6.40 page 51	GLA required providing alternative business premises.		
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.23	Re-examine the quantity of materials being transported by barge.		
Phase 2 Consultation Response p.23	Potential impact on bus services and stops in the vicinity of this site will also need to be agreed with TfL.		
Phase 2 Consultation Response p.23	An improved Thames Path and public realm should be re-instated		
Phase 2 Consultation Response p.23	There are schools within a relatively close proximity to the site. Due to the heightened usage and vulnerability of pedestrians connected with these schools, safety of construction traffic will be of paramount importance and to reduce the impacts (congestion,		

	air quality etc.) of these vehicles.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site

Section 18 Falconbrook Pumping Station			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
18.6.5 page 21	Support the identification of a new preferred site since phase one consultation/ the preferred site is more suitable than the site put forward at phase one consultation. Reasons included the proposed site has fewer impacts and enables redevelopment of the Bridges Court Car park to proceed.	This is a positive or neutral comment so no response is required.	
18.6.5 page 21	Proposal will ensure that odour is satisfactorily managed.	This is a positive or neutral comment so no response is required.	
18.6.8 page22	GLA highlighted the issue of a temporary loss of public open space as an unacceptable.	TW addressed the likely significant effects on open space in the <i>Environmental Statement</i> . TW also minimised the land take of the construction works and centre activity around the existing pumping station. TW in discussion with LBW proposed a high quality public realm that conforms to the local authority's <i>Landscape Management Plan</i> and restores York Gardens whilst also improving connectivity across the wider area as	
18.6.9 page22	GLA required ensuring that the re-installment works deliver an improved park and public realm.		

		shown on the indicative <i>Proposed Landscape Plan</i> .	
18.6.10 page22	GLA found the proposed site access as an unsuitable for the following reasons: <i>“The access route from the corner of Newcomen Road and Lavender Road is considered to be overly engineered for a park location, as in the access along the east boundary of the pumping station site. It would effectively divide the open space into two halves, as well as being generally disruptive to the use of the open space, as well as the adjacent roads of the Winstanley Estate. As part of the ongoing discussion, we would wish to see both these reconstructed o a less intrusive surface more in keeping with a park environment, and which would then need only to be used for parks maintenance purposes. This access should not be used by construction traffic, which should be restricted to use of the temporary access and egress arrangement from York ROAD. There will be significant access difficulties to the Library and the Community Centre. The proposed access route is unsuitable for this purpose.”</i>	TW stated that the site access will only be used periodically for permanent maintenance access.	
18.6.12 page24	GLA required seeing the effect of proposed access route to the site on local bus services and location of bus stops.	TW stated that the current proposals do not require relocation of any bus stop. TW presents the likely significant effects of construction traffic on bus routes and patronage in the <i>Transport Assessment</i> .	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
18.6.13 page24	GLA required a replacement bus stop to be provided as discussed with TFL.		
18.6.14 page24	GLA required the procedure for the technical approval for highway structure outlined within the Design Manual For Road and Bridges to be followed.	TW commenced to follow the appropriate consents routes for the highway structures and stated that the details of the works that are required are set out in the application.	
18.6.15 page25	GLA noted that that some indication has been given to the after use of construction site, these aspects should be kept under review to reflect needs and opportunities as they appear on the	TW designed a site in a way that improve the public realm and contribute positively to the wider York Garden and it is set out in the <i>Design and Access</i>	

	completion of works, which in some cases will be 10 years from now.	<i>Statement</i> and shown on the <i>Permanent Works Layout Plan</i> in the <i>Book of Plans</i> . TW also states that the site currently consists of an operational pumping station and this use will continue.	
18.6.16 page25	GLA recommend installing equipment to monitor air quality and odour effects.	TW confirmed that the use of air quality monitoring equipment is proposed during the operation of the tunnel and it is set out in the <i>Air Management Plan</i> .	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.25	Agree final site access junction design with TfL, including provision for the installed Cycle Superhighway 8, therefore cyclist safety will need to be a consideration in the design and assessment.		
Phase 2 Consultation Response p.25	It is likely that 2.4m acoustic screens be recommended for site boundaries close to residential properties		
Phase 2 Consultation Response p.25	An improved Thames Path and public realm should be re-instated		
Phase 2 Consultation Response p.25	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to consult TfL (London Buses)/Borough and get approval for final arrangements		
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works		

Section 19 Cremorne Wharf.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
19.6.5 page 41	Supports the identification of a new, more suitable, site from Phase 2 consultation	This is a positive or neutral comment so no response is required.	

19.6.8 page 41	Use of the safeguarded Wharf is complain with London Plan as long of the majority of materials are transported by barge	This is a positive or neutral comment so no response is required.	
19.6.13 page 43	Proposals ensure that odour is managed satisfactorily	This is a positive or neutral comment so no response is required.	
19.6.18 page 45	Integrate proposals with planned developments, including the adjacent Lots Road development	Lots Road Power Station redevelopment is currently uncertain but is anticipated to take place before TTT construction works start on site. TW will continue to discuss proposals with the developer to mitigate any potential effects their work may have on the development in the future.	
19.6.19 page 45	Detrimental effect on the business operations of the waste transfer station.	A socio economic assessment of the effect on the businesses and local economy is included in the ES. The Cremorne Wharf depot will be reinstated as part of the permanent design.	
19.6.20 page 45	Suitable alternative operating arrangements are required for the waste transfer station.	Construction is not expected to compromise the safeguarded use of this site, and while waste management could not continue in the short term, the permanent design allows the use to be reinstated. RBKC have said the waste operations have in fact moved from this site, and a mixed use development is being proposed for it.	
19.6.21 page 46	Construction traffic will cause congestion on the A3220-A3212.	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contractor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
19.6.22 page 47	Use river to transport more / all spoil and construction material	TW have increase the overall river use from 48%- 53% of all materials being	GLA feel there is the potential to increase use of the river still further and

		river borne	will continue to discuss this with TW and the PLA.
19.6.25 page 48	Cremorne Wharf to be returned to a viable wharf post construction.	TW design principles include a requirement to ensure this can be achieved, unless agreed otherwise with RBKC as the landowners.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.26	Ensure that the construction minimises disturbance to nearby residential properties, in particular those that overlook the Thames and for whom screening may be difficult.		
Phase 2 Consultation Response p.26	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to consult TfL (London Buses)/Borough and get approval for final arrangements		

Section 20 Chelsea Embankment Foreshore.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
20.6.5 page 30	Qualified support in terms of objection withdrawn to the use of the site due to H&S issues at the alternative in Ranelagh Gardens, although design issues still to be discussed.	This is a positive or neutral comment so no response is required.	
20.6.10 page 31	The previously shortlisted site at Ranelagh Gardens is not suitable –even though it has the advantage of reducing works in the Thames Foreshore and on the A3123		On balance TW considered Chelsea Embankment to be a preferable site.
20.6.12 page 32	Effect on foreshore habitat. Where temporary barge campsheds are proposed the foreshore must be fully reinstated after the construction works	The EIA as part of the ES address likely effects on the foreshore habitats and the CoCP sets out measures for managing the construction in with best practice and	

		in consultation with RBKC. Areas used for temporary works will be restored to a pre construction standard.	
20.6.13 page 32	Loss of trees is a concern. Trees to be retained / protected and other vegetation lost must be replaced.	Trees will be lost at this site but TW will seek to achieve a net increase in trees over the project as a whole. Measures to protect trees are set out in the CoCP.	
20.6.14 page 33	Scale of transport effects is not clear – assessment to date is very vague.	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contractor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
20.6.15 page 34	Effect of construction traffic on safety due to road closures and lane narrowing.	A full TA has been completed and accompanies the application. CoCP includes a site access requirements and a requirement for the contractor to produce a Traffic Management Plan and manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
20.6.16 page 34	Use river to transport more / all spoil and construction material	TW have increase the overall river use from 48% - 53% of all materials being river borne	GLA feel there is the potential to increase use of the river still further and will continue to discuss this with TW and the PLA.
20.6.17 page 35	Highway capacity on Chelsea Embankment, the A3212, to be maintained at all times. Any parking or loading to be kept to a minimum and buses to continue to be able to turn right from the A3212 into the bus turning circle.	A full TA has been completed and accompanies the application. CoCP includes a site access requirements and a requirement for the contractor to produce a Traffic Management Plan and manage construction traffic around the site. Buses will be able to turn right as requested, <i>except</i> where TW are undertaking landscape works in this location	Project wide issue of Transport Assessments and issues still outstanding to be resolved.

GLA Issues Unresolved from earlier phases	
Phase 2 Consultation Response p.27	The works phase 1 site drawings show both the sites on either side of Chelsea Embankment in operation. TfL had understood that works phase 1 would only show a single site in operation. Installation of planned new pedestrian crossing to be examined with local modelling and effects on existing signalised junctions.
Phase 2 Consultation Response p.27	It is noted that there is an underground structure planned below the A3212 and a large drop shaft planned to abut this road. It is highlighted that procedures for the Technical Approval for Highway Structures outlined within the DMRB will be required.
Phase 2 Consultation Response p.28	Any requirement to narrow carriageway widths on the Embankment raises safety issues, particularly for cyclists. Clearly this will need to be a key consideration in the design and assessment of proposals in this area. Mitigation measures to address this may be required.
Phase 2 Consultation Response p.28	The impact of the proposed diversion of the Thames Path will need assessing and appropriate mitigation put forward
Phase 2 Consultation Response p.28	Changes to pedestrian crossing arrangements. The impacts of these changes on highway capacity, safety etc need assessing and further discussion is required with TfL.
Phase 2 Consultation Response p.28	Ensure that the temporary diversion of the Thames Path is of good quality.
Phase 2 Consultation Response p.28	Potential for future use of site for river uses.
Phase 2 Consultation Response p.28	This site will continue to have a sewer overflow to the Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.
S48 Letter p.3	The resolution of heritage and design issues also requires detailed agreement which is currently un-resolved.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
TfL ST Protective Requirements	TW to consult TfL/borough and agree final diversion arrangements, incl. diversionary signage, publicity and information and other necessary mitigation measures
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works

Section 21 Kirtling Street.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
21.6.5 page 38	Kirtling Street may be acceptable as an alternative	This is a positive or neutral comment so	

	site to Battersea Power Station if the latter is not feasible	no response is required.	
21.6.6 page 38	Noise and vibration mitigation measures are satisfactory	This is a positive comment so no response is required.	
21.6.10 page 39	Odour will be managed satisfactorily	This is a positive comment so no response is required.	
21.6.12 page 39	Questioned if shortlisted sites were fully considered re: choice of Kirtling Street as a work site, citing redevelopment of Battersea Power Station as a possible issue	TW followed their site selection methodology in choosing the site	TfL is now working closely with TW re: synergies with Northern Line Extension in using the Kirtling Street site.
21.6.18 page 43	More information is required on construction noise and vibration mitigation sheds	Management measures set out in CoCP and the likely effects of noises are covered in the ES.	
21.6.20 page 44	Concern re: a safeguarding of Kirtling Wharf	Proposals do not preclude the future use of the safeguarded wharf	
21.6.21 page 44	Work with developers and TW on northern line extension	TTT project will not harm the regeneration of the area	TfL is now working closely with TW and the developers of BPS re: synergies with Northern Line Extension in using the Kirtling Street site.
21.6.22 page 44	Other planning and development mitigation – including ability of Cringle Dock and Kirtling Wharf to continue to operate as freight wharfs	Proposal incorporate the continued use of Cringle Dock and Kirtling Wharf	
21.6.23 page 44	Detrimental effects on business operations	No business expected to be relocated from this site	
21.6.27 page 46	Work with other scheme promoters on shared construction logistics etc...		TfL is now working closely with TW and the developers of BPS re: synergies with Northern Line Extension in using the Kirtling Street site.
21.6.29 page 47	Greater use of the river and coordination with NLE and other developments.	TW have increase the overall river use from 48%- 53% of all materials being river borne	GLA feel there is the potential to increase use of the river still further and will continue to discuss this with TW and the PLA. TfL are also now working closely with TW on use of the river for the NLE project

21.6.30 page 47	Consult with TfL and Local Authority on transport proposals and associated effects	We have consulted with both of them throughout to understand their issues and concerns.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
21.6.31 page 47	Detailed issues with the CoCP and highway works at Nine Elms junction –e.g. signals and bus stands; plus issues with adjacent residential proximity to work site.	Highway issues addressed in CoCP. CoCP also sets out measures to manage constructions which were developed with LB Wandsworth.	
21.6.34 page 49	Specific design amendment suggestions to minimise noise and odour; ensure reinstatement works minimise impact on regeneration of area and improves the Thames Path and public realm.	Covered in TW’s ES and Design Principles and Access Statement document. Shaft located to minimise problems. Scheme does not prevent future development on site. Thames Pathway is not affected by site proposals as it is currently an operational wharf. Improvement of the path is for a future developer to consider.	
21.6.35 page 50	Other mitigation measures including keeping under review the future use of construction sites	Post construction the wharf will returned to the operator, minus a small area for TTT permanent works... TW will continue to review the needs of construction and operational sites in the context of the Nine Elms regeneration proposals.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.29	Opportunities for utilising rail access to this site should also be explored further		
Phase 2 Consultation Response p.29	The impact of the proposed diversion of the Thames Path along Nine Elms Lane will need assessing and appropriate mitigation put forward		
Phase 2 Consultation Response p.29	The impact of the proposed diversion of the Thames Path will need assessing and appropriate mitigation put forward		
Phase 2 Consultation Response p.30	It is noted that the site abuts the A3205 and that there is a large drop shaft planned within the site. It is highlighted that procedures for the Technical Approval for Highway Structures outlined within the DMRB may be required.		
Phase 2 Consultation Response p.30	Details of the interaction between the logistics plan and strategy for this site and Heathwall Pumping Station, needs to be fully examined, discussed and understood with careful monitoring during the construction phase.		
Phase 2 Consultation Response p.30	Ensure suitable relocation of any affected boats.		
Phase 2 Consultation Response p.30	Ensure that the design of both the permanent and temporary works into the river does not cause unacceptable siltation, erosion or		

	other hydrological impacts
Phase 2 Consultation Response p.30	Further work on the completed scheme needs to be undertaken to ensure that the re-instatement provides an improved Thames Path and public realm appropriate for this changing location.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works

Section 22 Heathwall Pumping Station			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
22.6.5 page 22	Support for the use of the proposed site	This is a positive or neutral comment so no response is required.	
22.6.6 page 22	The impact of the shortlisted sites is similar but it is noted that the foreshore site is probably more expensive	This is a positive or neutral comment so no response is required.	
22.6.8 page 22	Support for specific design features such as the fact that the permanent structures will enable Middle Wharf to be a working wharf, and that the Thames path will be created along the river front	This is a positive or neutral comment so no response is required.	
22.6.13 page 23	Concerns on effect on a safeguarded Middle Wharf	Proposal will not affect the safeguarded status of the wharf. The wharf offers the opportunity to use the river for transporting materials and can be returned to its operational use following	

		the construction period	
22.6.14 page 24	Proposals will impact on local regeneration, including the VNEB opportunity area.	Construction works are consistent with the sites existing use. The permanent proposals will provide additional public space by the riverside, which is consistent with regeneration of the area.	
22.6.15 page 24	Proposals require relocation of riverboat homes and cause population dispersal.	Proposal will not automatically result in relocation of riverboat homes. Landowners may also have a statutory right to claim compensation if the value of their homes is reduced due to the TTT proposals, and TW has established an 'exceptional hardship procedure' which sets out how they would assess claims, as well as other guidance on, for example, CPO.	
22.6.16 page 25	Effect of construction on residential amenities	The CoCP sets out measures to mitigate against this, and the likely effects are assessed in the ES	
22.6.18 page 26	Greater use of the river and coordination with NLE and other developments.	TW have increase the overall river use from 48%- 53% of all materials being river borne	GLA feel there is the potential to increase use of the river still further and will continue to discuss this with TW and the PLA. TfL are also now working closely with TW on use of the river for the NLE project
22.6.19 page 26	Ensure design does not cause siltation, erosion or other hydrological impacts.	The Engineering Design Statement which accompanies the application sets out details of this will be addressed and monitored.	
22.6.23 page 28	Specific design amendment suggestions: TW to find a suitable alternative location which is acceptable to the owners of the Battersea Barge and the local council, and facilitate its return post construction. TW should consider the potential to relocate, build	TW have engaged with the owners of the Battersea Barge to agree an alternative location during the construction phase. Other issues are covered in TW's ES and Design Principles document.	

	above or around the pumping station building and if this is not possible they should enhance the appearance of the building. TW to ensure that they minimise noise and odour; ensure reinstatement works minimise impact on regeneration of area including the development potential of the site.		
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.31	Ensure a good quality signposting of the Thames Path, during construction works.		
Phase 2 Consultation Response p.31	It is noted that the site abuts the A3205 and that there is a large drop shaft planned within the site. It is highlighted that procedures for the Technical Approval for Highway Structures outlined within the DMRB may be required.		
Phase 2 Consultation Response p.31	Details of the interaction between the logistics plan and strategy for this site and Kirtling Street needs to be fully examined, discussed and understood with careful monitoring during the construction phase.		
Phase 2 Consultation Response p.31	Details of the interaction between the logistics plan and strategy for this site and Heathwall Pumping Station, needs to be fully examined, discussed and understood with careful monitoring during the construction phase.		
Phase 2 Consultation Response p.31	Final site access junction design from Nine Elms Lane will need agreeing with TfL		
Phase 2 Consultation Response p.31	Ensure that re-instatement works minimise their impact on the regeneration of the area including the development potential of the site		
Phase 2 Consultation Response p.31	This site will continue to have a sewer overflow to the River Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.		
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works		
Section 23 Albert Embankment Foreshore.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
23.6.15 page 41	Effect on foreshore habitats	The ES address likely effects on the	

		foreshore habitats and the CoCP sets out measures for managing the construction to protect the foreshore	
23.6.18 page 43	Effect of construction on LUL Victoria Line	Works were revised to move further from LUL tunnels. CoCP sets out measures to manage construction and TW continue to liaise with LUL.	
23.6.19 page 43	Undertake protection works to Vauxhall Bridge and LUL Victoria Line tunnels	Works were revised to move further from LUL tunnels. CoCP sets out measures to manage construction and TW continue to liaise with LUL.	
23.6.20 page 39	Shared site access is unsuitable, especially due to London Duck Tour's requirements	The CoCP has details of 2 alternative site access points as part of submission for SoS determination, with all the relevant information included.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.32	Further investigate the use of barges to this site.		
Phase 2 Consultation Response p.32	Demonstrate suitable arrangements for holding/inspecting vehicles arriving at site, without disrupting the operation of the TLRN (A3036)		
Phase 2 Consultation Response p.32	Details of the interaction between the logistics plan and strategy for this site and Kirtling Street needs to be fully examined, discussed and understood with careful monitoring during the construction phase.		
Phase 2 Consultation Response p.32	Ensure that construction impacts are minimised to an acceptable level. It is likely that 2.4m acoustic screens be recommended for site boundary close to the commercial office properties		
Phase 2 Consultation Response p.32	Ensure suitable protection to Vauxhall Bridge and the Victoria Line tunnels and operation		
Phase 2 Consultation Response p.32	The diversion route for the Thames Path is acceptable, although diversionary signage etc which will need to be discussed further with TfL		
Phase 2 Consultation Response p.32	The ability of other vessels to use Lacks Dock will need to be considered.		
Phase 2 Consultation Response p.32	Ensure impacts on historic embankment structures are minimised		
Phase 2 Consultation Response p.32	The addition of public space is welcomed.		

Phase 2 Consultation Response p.32	Discuss with river users, TfL and the LPA possible uses of the site for river uses including as a public wharf.
Phase 2 Consultation Response p.32	Ensure that an improved Thames Path and public realm are re-instated. The permanent structures offer the opportunity for interesting public spaces and safe access to the foreshore should be retained/improved.
Phase 2 Consultation Response p.32	This site will continue to have a sewer overflow to the River Thames for occasions when the Thames Tunnel capacity is reached. Equipment should be installed to monitor the performance of the system once operational.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to consult TfL/borough and agree final diversion arrangements, incl. diversionary signage, publicity and information and other necessary mitigation measures
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
S48 Letter p.4	An additional site access point has been included adjacent to Camelford House. Whilst this is not expected to cause any different issues to the previous access issues, these remain to be resolved with TfL.

Section 24 Victoria Embankment Foreshore.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
24.6.10 page 43	Construction traffic emissions and air quality	The likely effects are covered in the ES	
24.6.11 page 43	Effect of construction activities on Conservation area	The likely effects are covered in the ES	
24.6.12 page 43	Effect of construction activities on listed buildings and structures	The likely effects are covered in the ES	
24.6.13 page 43	Provide suitable protection for listed structures during construction	Covered by the CoCP	
24.6.14 page 44	Loss of trees	TW's Design Principles confirms that	

		trees will be lost, the likely effect of which is covered in the ES	
24.6.15 page 45	Detrimental effects on businesses – The Hispaniola and Tatter shall Castle	The proposed location of the latter is set out in the Planning Statement and Design and Access statement, and TW have sought to permanently relocate the vessel as close as possible to its existing location	
24.6.16 page 45	Effect of construction on LUL Bakerloo and District lines	The LUL tunnels influenced the proposals for this site and TW discussed their approach with TfL. TW believe there is no major issue	
24.6.17page 45	Effect of construction on other proposed below ground infrastructure (pipe subway)	Utilities close to the site would be surveyed prior to and protected during construction as per TW 's utilities statement	
24.6.18 page 46	Congestion from construction traffic	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contactor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
24.6.19 page 46	More information required on transport mitigation re: road safety	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contactor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
24.6.28 page 48	Specific design amendment suggestions related to: <ul style="list-style-type: none"> • reinstatement of embankment wall • vent pipe • site access over permanent foreshore • cycle facilities 	Navigation Issues and Preliminary Risk Assessment consider these issues and mitigation measures associated with propose permanent and temporary structures within the river Thanet	
24.6.30 page 50	Procedures for technical approval of highway structures outlined in DMRB is required		
24.6.31 page 50	Other mitigation measures	CoCP covers this.	
24.6.33 page 51	Provision of alternative business premises for the Tattershall Castle	The proposed is set out in the Planning Statement and Design and Access statement	
GLA Issues Unresolved from earlier phases			

Phase 2 Consultation Response p.33	The works proposed at Chelsea Embankment, Victoria Embankment and Blackfriars will all impact on a critical east-west corridor through central London. As a result their impact will need to be assessed together, and depending on the outcome of that assessment, careful consideration given to the phasing of works so as to minimise disruption to users.
Phase 2 Consultation Response p.33	The impact of the proposed diversion of the Thames Path will need assessing and appropriate mitigation put forward, including pedestrian crossings, diversionary signage etc which will need to be discussed further with TfL.
Phase 2 Consultation Response p.33	The scheme proposal will require the temporary loss of coach parking on Victoria Embankment for 4.5 years. To mitigate this impact alternative provision will need to be made. This should be discussed with TfL and City of Westminster.
Phase 2 Consultation Response p.34	The design of the site access/cross-over to the permanent foreshore appears over engineered considering the low level of proposed use.
Phase 2 Consultation Response p.34	It is noted that the low level sewer interception chamber will affect the A3211 Victoria Embankment. It is highlighted from that procedures for the Technical Approval for Highway Structures outlined within the DMRB will be required.
Phase 2 Consultation Response p.34	It is also highlighted to the scheme promoter that there will be effects from works surrounding Bazelgette's Pipe subway (WCC owned) and statutory undertakers plant that are located between the revetment and the carriageway. The details of these works will need to be agreed with both TfL and WCC.
Phase 2 Consultation Response p.34	It is noted that during the construction, vessels used to build the site may require anchors or ground mooring which could cause problems to the safe navigation of passenger services from the Pier
Phase 2 Consultation Response p.34	Ensure that LVMF view is not harmed
Phase 2 Consultation Response p.34	Ensure that an improved Thames Path is re-instated and the additional public realm has a clear purpose reflecting its high profile location.
Phase 2 Consultation Response p.34	There may also be opportunities to incorporate cycle facilities in the new area of public realm.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to agree arrangements for temporary closure, publicity etc and alternative provision. All costs to be met.
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site

TfL ST Protective Requirements	TW to consult and get approval from LRS over any impact on TfL services and cover costs
TfL ST Protective Requirements	TW to consult TfL and get approval for final proposals, species etc

Section 25 Blackfriars Bridge Foreshore.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
25.6.5 page 28	There appears to be no realistic alternative site but concerns exist about the site construction proposals and the likely effects on highway capacity	This is a positive or neutral comment so no response is required.	
25.6.9 page 29	Qualified support for the site due to improved Thames Path and public realm	This is a positive or neutral comment so no response is required.	
25.6.10 page 29	Odours will be managed satisfactorily	This is a positive or neutral comment so no response is required.	
25.6.13 page 30	Construction site layout is unsuitable as closure of westbound slip road is unacceptable	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contractor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
25.6.14 page 31	Construction programme issue in terms of clash with works required to the Blackfriars Bridgehead Structure		
25.6.15 page 31	Provide suitable protection for listed structures during construction	Assessment of likely effects is in the ES and design has taken account of listed buildings as explained in the Heritage Statement and Design and Access Statement. Construction is covered by	

		the CoCP	
25.6.16 page 32	Effect of foreshore habitats	Covered in ES	
25.6.18 page 33	Temporary business relocation and associated effects. TfL has a tenant within the existing pump house at Blackfriars Pier	A socio economic assessment of the effect on the businesses is included in the ES and details of temporary business relocation are set out in the Planning Statement. TW has published compensation guidance which sets out how they would assess claims, as well as other guidance on, for example, CPO.	
25.6.19 page 34	Scale of transport effects is not clear. The assessment to date is very vague, and no construction routes have been identified for this site.	A full TA has been completed and accompanies the application. CoCP includes a requirement for the contractor to manage construction traffic around the site.	Project wide issue of Transport Assessments and issues still outstanding to be resolved.
25.6.21 page 35	Provide a suitable and safe Thanet Path diversion with ped crossings and signage etc...	Provision is made for the diversion of the Thames Path and is set out in the Access Plan in the Book of Plans. The CoCP covers signage and crossings etc....	
25.6.22 page 35	Use river to transport more / all spoil and construction material	TW have increase the overall river use from 48% - 53% of all materials being river borne	GLA feel there is the potential to increase use of the river still further and will continue to discuss this with TW and the PLA.
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.36	Phase 3 is shown as being for a period of 2 years. It is during this phase that the closure of the slip-road adjacent to the site is proposed. A closure of the slip road for this period of time would be unacceptable.		
Phase 2 Consultation Response p.36	Any requirement to narrow carriageway widths on the Embankment raises general safety issues, particularly for cyclists. Clearly this will need to be a key consideration in the design and assessment of proposals in this area. Mitigation measures to address this will be required.		
Phase 2 Consultation Response p.36	The works proposed at Chelsea Embankment, Victoria Embankment and Blackfriars will all impact on a critical east-west corridor through central London. As a result their impact will need to be assessed together as part of the construction logistics strategy and ongoing TA/EIA work being undertaken		
Phase 2 Consultation Response p.36	The scheme proposal will require the temporary loss of coach parking on Victoria Embankment. To mitigate this impact alternative provision will need to be made. This should be discussed with TfL.		

Phase 2 Consultation Response p.36	The design of the site access/cross-over to the permanent foreshore appears over engineered considering the low level of proposed use.
Phase 2 Consultation Response p.36	The scheme proposes the removal of the existing Blackfriars Pier. The provision of a new pier is imperative and is currently proposed to the east of Blackfriars Bridge.
Phase 2 Consultation Response p.36-37	It is noted that during the construction, vessels used to build the site may require anchors or ground mooring which could cause problems to the safe navigation of passenger services from the Pier.
Phase 2 Consultation Response p.37	It is noted that the low level sewer interception chamber will affect the A3211 The Embankment and there may be a clash with works required to Blackfriars Bridgehead structure
Phase 2 Consultation Response p.37	There is a potential interface with the London Underground Waterloo & City Line and District & Circle Line Tunnels and as such, further advanced detailed discussions on the intended work are advised.
Phase 2 Consultation Response p.37	Ensure that the design of both the permanent and temporary works into the river does not cause unacceptable siltation, erosion or other hydrological impacts.
Phase 2 Consultation Response p.37	There may also be opportunities to incorporate cycle facilities in the new area of public realm.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to agree arrangements for temporary closure, publicity etc and alternative provision. All costs to be met.
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works
TfL ST Protective Requirements	TW to reprovide existing office space housed in pump house.
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
TfL ST Protective Requirements	<p>TW to minimise disruption to LRS services and passengers and keep pier provision and access throughout duration of works.</p> <p>TW to consult TfL (LRS) and agree proposed works, access arrangements, method statements, mitigation measures, programme etc. All costs to be met, including passenger publicity and information - works agreement with TfL (LRS) will be required.</p> <p>TW to secure all necessary consents including new River Licence from PLA.</p> <p>TW to make provision for any ongoing dredging costs associated with new pier location.</p>
TfL ST Protective Requirements	TW to consult TfL/borough and agree final diversion arrangements, incl. diversionary signage, publicity and information and other

	necessary mitigation measures
TfL ST Protective Requirements	TW to consult TfL (London Buses) on impact of temporary works on bus services/stand and any required diversions/enhancements to maintain services. TW to meet costs.
S48 Letter p.4	It is of considerable concern that the many significant issues raised by the Mayor at Phase 2 consultation have not been more fully resolved. For example, the phasing, general arrangements and design for the proposed relocation of the Blackfriars Millennium Pier still needs to be agreed with TfL.

Section 26 Shad Thames Pumping Station			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
26.6.5 page 28	Supports the identification of a new, more suitable, site from Phase 1 consultation	This is a positive or neutral comment so no response is required.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.38	The works are in close proximity to existing residential properties and high levels of sound/vibration protection will be required		
Phase 2 Consultation Response p.38	Careful traffic management on the narrow local roads will need to be agreed with LB Southwark.		
Phase 2 Consultation Response p.38	The impact of construction vehicles using the adjacent TLRN A200 Jamaica Road will need to be assessed and discussed further with TfL.		

Section 27 Chambers Wharf.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
27.6.5 p.44	Support the use of the proposed site	This is a positive or neutral comment so no response is required.	
27.6.6 p.44	Mitigation proposed to address construction noise and vibration effects is satisfactory	This is a positive or neutral comment so no response is required.	
27.6.23 p.51	Proposals will impact on local regeneration; site fronting river will not be available for	Construction is not expected to compromise the wider regeneration of	

	development until 2022-23.	the area or future redevelopment of the site. There are no adopted site specific policies affecting this site, although it is within the Southwark Unitary Development Plan, as part of the strategic Thames Policy Area. Where possible, the proposals have sought to address the general requirements of local planning policies. With appropriate mitigation measures, it is unlikely that these policies would be impacted on unacceptably.	
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GLA Issues Unresolved from earlier phases	
Phase 2 Consultation Response p.39	Concern about proximity of site to 3 schools.
Phase 2 Consultation Response p.39	The impact of construction vehicles using the adjacent TLRN A200 Jamaica Road will need to be assessed and discussed further with TfL.
Phase 2 Consultation Response p.39	The existing Thames Path goes around the site, but following completion of the works the Thames Path should be routed along the river front, with appropriate connections back inland. This does not appear to be illustrated at present.
Phase 2 Consultation Response p.39	Consideration should also be given to the provision of cycle facilities at this site as part of an improved public realm.
TfL ST Protective Requirements	TW to consult TfL/borough and agree final diversion arrangements, incl. diversionary signage, publicity and information and other necessary mitigation measures
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
S48 Letter p.4	Should be aware of Mayor's concerns in Phase 2 consultation and subsequent letters.

Section 28 Earl Pumping Station.			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response

28.6.5 p.24	Support the use of the proposed site	This is a positive or neutral comment so no response is required.	
28.6.8 p.25	Proposals will ensure that odour is satisfactorily managed	This is a positive or neutral comment so no response is required.	
28.6.15 p.29	Provide an alternative construction traffic route to and from the site as to avoid works proposed on Deptford Church Street.	Assessment of likely significant effects on transport and access is set out in Vol 22 of <i>Environmental Statement</i> which accompanies the application. The suspension of on-street parking spaces is temporary and limited to phase two of the construction period. There is spare capacity locally to accommodate this displacement.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.43	Give consideration to the opportunity to tranship materials to and from the site locally to the safeguarded Convoys Wharf, approximately 600m south east of the site.		
Phase 2 Consultation Response p.43	Ensure an acceptable minimum level of disruption to nearby residents.		
Phase 2 Consultation Response p.43	Ensure that local businesses are suitably relocated		
Phase 2 Consultation Response p.43	Ensure that part of the site is suitable for redevelopment following completion of the works, this is indicated in the consultation material.		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		

Section 29 Deptford Church Street			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
29.6.5 p.50	Support the use of the proposed site	This is a positive or neutral comment so no response is required.	
29.6.6 p. 51	Proposal to enhance other public open space during the works is welcomed.	This is a positive or neutral comment so no response is required.	
29.6.23 p.56	Temporary loss of public open space is unacceptable. Lack contract for management of	See <i>Environmental Statement</i> providing an assessment of the potential socio-	

	Sue Godfrey Reserve so potential for dog fouling issues, nature reserve different and no budget to maintain. Church yard not appropriate for recreational activities.	economic effects of proposed works on public open space. Number of park users impacted by the temporary closure would be restricted in number. <i>Open Space Assessment</i> and <i>Planning Statement</i> provides further details. Upon DCO submission mitigation measures will be discussed as part of Section 174 agreements including management of the reserve.	
29.6.24 p.57	Detrimental effect on business operations along Crossfield Street. Unclear if businesses can remain operational. If access and parking affected, viability of the business would be undermined and have a significant adverse impact on the local people and the local economy.	A socio-economic assessment of the likely significant effects on the businesses and the local economy has been completed and is presented in Vol 23 of our <i>Environmental Statement</i> . Works will not have a detrimental effect on businesses. Loss of some on street car parking but there is sufficient unused capacity elsewhere in the area set out in <i>Transport Assessment</i> .	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.44	Two way working must be retained on Deptford Church St. The period of phase 3, during which the bus lanes on Deptford Church Street are removed, should be kept to an absolute minimum. The impact of these arrangements will need to be assessed (considering the impact of any pedestrian diversions requiring additional crossing movements) with appropriate traffic modelling tools and discussed with TfL.		
Phase 2 Consultation Response p.44	Consideration should be given to the opportunity to tranship materials to and from the site locally to Convoys Wharf, approximately 600m north of the site.		
Phase 2 Consultation Response p.44	To mitigate the impact on bus service frequency, journey times and journey time reliability both an enhanced service frequency (preferred) or a diversion of the route should be considered. The additional cost of any agreed mitigation measure would have to be met by the scheme promoter. Potential impact on bus services and proposals to relocate bus stops in the vicinity of this site will require further discussion with TfL		
Phase 2 Consultation Response p.44	Any requirement to narrow carriageway widths on Deptford Church Street raises general safety issues, particularly for cyclists. Clearly this will need to be a key consideration in the design and assessment of proposals in this area.		
Phase 2 Consultation Response p.44-45	The impact of the proposed diversion of pedestrian routes on Deptford Church Street will need assessing and appropriate mitigation put forward		

Phase 2 Consultation Response p.45	Ensure that any disruption to the school and church are minimised, consideration should be given to an enclosure building as is proposed at other sites.
Phase 2 Consultation Response p.45	Thames Water should work with LB Lewisham, the school and Church to ensure that the re-instatement works result in a positive benefit to the local area and enhance the public realm.
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
TfL ST Protective Requirements	TW to consult TfL (London Buses) on impact of temporary works on bus services/stand and any required diversions/enhancements to maintain services. TW to meet costs.
TfL ST Protective Requirements	TW to consult TfL on impact of temporary works on bus services and any required diversions/enhancements to maintain services. TW to meet costs

Section 30 Greenwich Pumping Station			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
30.6.6 p.35	Welcome that the proposals include a building over the main shaft to reduce noise.	This is a positive or neutral comment so no response is required.	
30.6.10 p.36	Object to use of proposed site. Although there is no realistic alternative the proposals are not acceptable due to proximity of the drop shaft to the DLR viaduct.	This is the most suitable site set out in vol 22 of <i>Final Report on Site Selection Process</i> .	
30.6.14 p.37	Construction site layout is unsuitable: the CSO shaft too close to the DLR viaduct and impacts are unacceptable.	The permanent works have been designed and located to ensure an appropriate distance between existing infrastructure within the pumping station and adjacent infrastructure, shown on the <i>Site Works Parameter Plan</i> and <i>Permanent Works Layout Plan</i> contained	

		in the <i>Book of Plans</i> .	
30.6.14 p.37	Conflict with emerging regeneration proposals. Initial pre-app discussions with London Borough of Greenwich as local planning authority regarding these proposals have already commenced and are ongoing.	Project was aware of proposals as it developed proposals for site. The <i>Planning Statement</i> considers the effects.	
30.6.15 p.38-39	Concern regarding the effect of construction on national rail and DLR viaducts.	As part of asset protected process have undertaken assessments of the potential impact of ground movements from tunnel and shaft construction and other construction related activities where necessary. Project has very deep tunnels relative to other tunnelling projects which would minimise impact on existing infrastructure. <i>Settlement information paper</i> contains details of assessments and measures proposed to avoid damage to third party infrastructure. Discussions ongoing with DLR and Network Rail.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.46	Significant volumes of HGVs are identified as being required to access this site. It is also in close proximity to Greenwich Town Centre, is relatively constrained in size and has a number of access points. Although Deptford Creek serving the site is constrained by tidal flow, it presents potential beneficial opportunities for use of the nearby river/wharfs for transporting materials to and from this site during construction. The Mayor is not convinced that these opportunities have been fully explored.		
Phase 2 Consultation Response p.46	Ensure acceptable minimal impacts on nearby residents, including any new residents as a result of recent planning permission(s). It is welcomed that the proposals include a building over the main shaft to reduce noise.		
Phase 2 Consultation Response p.47	Thames Water should examine opportunities to enhance river uses using any structures required for this project		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		
S48 Letter p.5	The Mayor has stated at Phase 2 consultation that the current proposals are not acceptable due to the proximity of works to the DLRL viaduct, this position remains un-resolved.		

Section 31 King Edward Memorial park Foreshore			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
31.6.5 p.66	Support the use of the proposed site	This is a positive or neutral comment so no response is required.	
31.6.7 p.66	Proposals will ensure that the Thames Path is kept open	This is a positive or neutral comment so no response is required.	
31.6.9 p.66	Support for the proposals as it results in an increase in the area of the park in this location, which is recognised as being short of open space.	This is a positive or neutral comment so no response is required.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.41	Ensure that construction impacts are minimised to an acceptable level. It is likely that 2.4m acoustic screens be recommended for site boundaries close to residential properties.		
Phase 2 Consultation Response p.41	Give further consideration to greater use of the river for transporting materials to and from this site during construction		
Phase 2 Consultation Response p.41	Potential impacts on bus services and proposals to relocate bus stops in the vicinity of this site will require further discussion with TfL.		
Phase 2 Consultation Response p.41	Ensure suitable protection to the Rotherhithe Tunnel		
Phase 2 Consultation Response p.41	Ensure suitable relocation of the nearby Shadwell Basin sailing facilities		
Phase 2 Consultation Response p.41	Ensure that the design of both the permanent and temporary works into the river does not cause unacceptable siltation, erosion or other hydrological impacts		
Phase 2 Consultation Response p.41	Ensure that the location and design of the ventilation plant should ensure that any noise/odour impacts on nearby residents are minimised.		
Phase 2 Consultation Response p.41	Ensure good quality re-instatement of sailing club facilities		
Phase 2 Consultation Response p.41	Investigate whether cycle facilities should be installed as part of the re-instatement		

Phase 2 Consultation Response p.41	Work with TfL, river operators and the LB Tower Hamlets to determine whether the re-instatement works should be designed to leave passenger, freight or recreational river facilities at the site
TfL ST Protective Requirements	TW to consult TfL/Borough and get approval for final works layout/phasing/mitigation etc (incl. Traffic Management Plan sign off)- works with TfL will be required for TLRN works
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough
TfL ST Protective Requirements	TW to follow TD procedures/guidelines for design, assessment and works
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site
TfL ST Protective Requirements	TW to consult TfL (London Buses) and get approval for final arrangements
TfL ST Protective Requirements	TW to consult TfL/borough and agree final diversion arrangements, incl. diversionary signage, publicity and information and other necessary mitigation measures
S48 Letter p.4	The inclusion of the sports pitches should continue to provide sports facilities. Works to the junction with the A1203 The Highway will require the agreement of TfL. It is a considerable concern that the works at this site are now expected to take longer, especially given the Mayor's comments at Phase 2 consultation and in subsequent letters.

Section 32 Bekesbourne Street			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
32.6.3 p.16	Resubmitted comments from phase 2. We will refer to Phase 2 Consultation response.		
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.42	Ensure satisfactory highway management measures, particularly given that the street is narrow and shared between vehicles and pedestrians		
Phase 2 Consultation Response p.42	Ensure that construction impacts are minimised to an acceptable level. It is likely that 2.4m acoustic screens be recommended for site boundaries close to residential properties		
Phase 2 Consultation Response p.42	The location of the proposed electrical and control kiosk at the corner of Bekesbourne St and Ratcliffe Lane lies wholly within land owned by TfL, the current arrangement is not acceptable and will need to be adjusted with the agreement of TfL/DLR.		

S48 Letter p.4	The site area and extent of works appear to have increased in size. This is of particular concern. The Mayor has previously stated in the Phase 2 consultation response that the proposals here are unacceptable due to the proximity to TfL assets. Those issues remain un-resolved despite DLRL trying to engage with Thames Water and proposing an alternative location for the vent pipe required by Thames Water which will have a greatly reduced effect on DLRL and Limehouse station.
DLR response	<p>The comments relate to the siting of the electrical and control kiosk and that has been moved away from DLRL land in response to our consultation comments so is no longer an issue. The issue now is the siting of a vent pipe and the proposed use of part of DLRL's land for a worksite associated with not so much the installation of the worksite, but works within Bekesbourne Street.</p> <p>Bear in mind TWUL proposals involve our land in two ways and that the land is "operational land".</p> <p>First, to use the land temporarily as a construction worksite. We have no particular issue with this in principle, so long as at the time we have not undertaken some kind of development of it that means we would no longer want TWUL using it. Reflecting this, if we are to agree their prospective temporary use of it, we would want that qualified in any property agreement, whereby TWUL accepts the risk that by the time they look to use it, we have somehow redeveloped it or have intensified our operational use of it whereby we would not wish to suffer any operational disturbance through their use of it. This would require that TWUL would be bound to have some alternative solution available to them.</p> <p>Second, to site the notorious vent pipe on the land at the kerbline that is the back edge of the footpath to the public highway. This is not agreeable to us in principle for all the reasons we have at length explained to TWUL to date, including, we do not want a vent pipe in that location as its siting may well be a constraint for our future layout and operational use of our land. Once sited there, TWUL would secure statutory rights to its location that we would not be able to overcome, so we would be stuck with it as a constraint. Also, we do not want the risk of smells in an area that may well be re-planned by us and be in the immediate proximity of the station entrance. The vent pipe would also be a physical obstruction.</p> <p>The alternative site we have consistently proposed would mean the vent pipe there would not be a physical obstruction or an operational constraint.</p>

Section 33 Abbey Mills Pumping Station			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response

33.6.3 p.25	Resubmitted comments from phase 2. We will refer to Phase 2 Consultation response.		
33.6.8 p.28	Use the river to transport more/all construction materials and spoil.	Approach to river transport set out in <i>Transport Strategy</i> . We will not commit to river transport for this site until we have fully evaluated the lessons learned from how the Lee Tunnel project made use of the river.	
33.6.10 p.29	Specific design amendment suggestion: rationalise the extent of permanent plant at this site	Factors such as the proximity of Lee Tunnel, existing pumping station, existing built sewage infrastructure and the adjacent Prescott Channel and Channelsea Creek constrained the site layout. Details of the proposed layout illustrated on our <i>Permanent Works Layout Plan</i> and set out in our <i>Design and Access Statement</i> .	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.47	Ensure that the location and design of the ventilation plant minimises any noise/odour impacts on future development in this area. The current proposals appear to show a spread of permanent plant across a wide area, this should be rationalised where possible.		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		

Section 34 Beckton Sewage Treatment Works			
Ref and page no.	GLA comment - summary	TWUL response to GLA comment	GLA response to TWUL response
34.6.3 p.15	Resubmitted comments from phase 2. We will refer to Phase 2 Consultation response.		
34.6.9 p.16-17	Opportunities to further reduce odour nuisance from this site should be taken.	The works would not result in any additional odour at the site. We are investing £67m as part of a separate project to cover parts of the site, including all 16 primary settlement tanks	

		in order to reduce existing odour emissions by 50%. The upgrade is due for completion in 2014.	
GLA Issues Unresolved from earlier phases			
Phase 2 Consultation Response p.47	Any significant movement of construction materials/spoil away should be by barge from the site		
TfL ST Protective Requirements	TW to agree lorry routing with TfL/borough		
TfL ST Protective Requirements	TW to produce and get approval of CLP and Travel Plan for site		