

LONDON BOROUGH OF RICHMOND UPON THAMES

THAMES TIDEWAY TUNNEL PROJECT

**SUMMARY OF
RESPONSE TO OTHER PARTIES' WRITTEN
REPRESENTATIONS**

(UPR LBRUT06)

1. This document is a summary of the London Borough of Richmond upon Thames (LBRUT) response to points raised in other parties' Written Representations, and in particular the views of the London Borough of Hammersmith and Fulham (LBHF) regarding the alternative use of Barn Elms as a main drive tunnel site for the Thames Tideway Tunnel project.
2. According to information provided by Thames Water, a main drive tunnel proposal would occupy a different site and would be of a different scale of magnitude of development, particularly at the construction stage, that would require a new Environmental Statement and further supporting information to be submitted and assessed. On the basis of the information currently available, LBRUT has been unable to undertake a full evaluation of the potential impact of the use of Barn Elms as a main drive site, but will identify here the principal concerns that it anticipates will arise.

Impact on Metropolitan Open Land

3. Thames Water states that it has identified information, not available at phase 1 consultation stage, which has led to the location of a main tunnel drive site being moved 120 metres further north than that previously proposed. Thames Water has confirmed that the site area would be 2.05 hectares, but this does not include the river-based campshed and jetty facilities.
4. The use of Barn Elms as a main drive site would involve a significantly different scale of development, both constructional and operational, to that of a CSO interception site and that a CSO has to be intercepted where it is located, which justifies an MOL location, whereas a main drive site is not tied to a CSO location. In this case, an alternative site is available, making it harder, in planning policy terms, to justify an MOL location. LBRUT shares this view.
5. On the basis of the information available from Thames Water, LBRUT shares the Mayor of London's concern that the size of the construction site and the associated impacts would be much larger (and would be in a different location) than currently proposed for the CSO site, with a consequentially increased impact on the MOL. It is likely, also, that the impact of the operational site would have a greater impact, which would also have to be fully assessed.
6. A proposal for a main drive site would also involve the provision of foreshore and in-river structures, including campshed, jetty and wharf facilities and overhead conveyors, to allow for removal of spoil and delivery of materials by barge. During the main tunnel drive and secondary lining phases, a noise shed would be required in order to mitigate potential noise impacts. These would be extremely harmful to the open character of the MOL, and would have an adverse impact on the character and appearance of this part of the River Thames. The proposals would therefore be contrary to the MOL and River Thames policies of both the London Plan and the LBRUT Local Development Framework.

Loss of Sports Pitches

7. Thames Water has reasserted that the relocated main drive site at Barn Elms would result in the loss of 4 to 5 well-used sports pitches and that remaining areas of recreational facilities would require mitigation from construction work impacts. Comparison of the drive tunnel site plan Figure 24.2 of Thames Water's Question 14.24 response with drawing DCO-PP-04X-BAREL-070038, submitted with the Book of Plans (Doc 9.05) on 23 September 2013, supports

this view, indicating that two football and two rugby pitches would be lost as a result of the reconfigured main drive site.

8. LBRUT would object to the loss of these sports facilities, even for a temporary period, which could, in practice, be for a decade or more.

Diversion of Thames Path

9. Thames Water suggests that the Thames Path would be maintained. The construction site and the river-based jetty facilities would be separated to achieve this and overhead conveyors would be used to avoid the long-term closure or rerouting of the Thames Path during the construction period.
10. Whilst LBRUT would not object to the principle of the Thames Path being maintained in this way, the Council does object to the physical consequences of this, namely the increased height and bulk of riverside facilities.

Use of the River Thames Foreshore

11. LBRUT considers that the impact of a main drive site on the River Thames foreshore will be unacceptable. As described by Thames Water, the construction site would involve the provision of a campshed, jetty and wharf facilities to accommodate up to five barges, with associated dredging to achieve a sufficient depth of water to facilitate barge use.
12. LBRUT considers that the in-river works will result in harm to aquatic ecology, resulting in the loss of fish habitat. Further adverse impact on spawning fish, in particular Dace, would result from floodlights on the in-river structures, particularly during 24-hour working periods.
13. The use of Barn Elms as a main drive tunnel site, however, would also include a CSO interception, which would give rise, at operational stage, to a significant beneficial effect due to improvements in water quality.
14. LBRUT has previously objected to 24-hour working proposed as part of the current scheme, due to the impact on terrestrial ecology, particularly bats, which are known to use the tree-line on the eastern and southern boundaries of Barn Elms for commuting and foraging. This impact would be exacerbated by the provision of a main tunnel drive work site, with its requirement for a longer 24-hour working period and for floodlights to be provided as part of the in-river structures to facilitate barge use.

Disruption of Events on the River

15. Thames Water has identified a further 10 major rowing races, in addition to the University Boat Race and the Head of the River Race, which would require barge activities to be suspended.
16. The Port of London Authority web-site, in its Sailing Events Calendar, identifies a further 17 sailing events between March and October 2013, at or passing through Barn Elms Reach, which may be expected to affect navigation. It is stated that this is not an exhaustive list.
17. Thames Water identifies 145 river craft movements on a November weekday afternoon and 457 movements on a November Saturday afternoon, significantly greater than river traffic passing Carnwath Road at the same times.

18. The Royal Yachting Association has confirmed that Barn Elms Reach is the busiest stretch of inland waterway in the country.
19. LBRUT objects to the proposal to locate a main drive site at Barn Elms because of the likelihood of significant impacts on, and conflict with, existing and projected recreational river users.
20. The Port of London Authority (PLA) states that it believes, inter alia, the alternative drive strategy proposed by LBHF to be less satisfactory than the current DCO proposals.

Greenfield v Brownfield Site

21. Paragraph 130 of the Mayor's LIR states:
"Given the above, the Mayor's view is that Carnwath Road is significantly preferable to Barn Elms as a drive site. This view does not seek to undermine the need for strict controls and mitigation measures for any construction at Carnwath Road." LBRUT shares this view.

Access to Strategic Road Network

22. The Mayor for London confirms that, given the number of unresolved issues outstanding in respect of the Transport Assessments for each site across the project, TfL is unable to indicate at this stage which sites are acceptable. Given that no modelling appears to have been undertaken in respect of the alternative drive strategy put forward by LBHF, it is fair to say that it is not possible to comment in detail on the assertions put forward by LBHF in support of their proposal.
23. LBRUT has previously raised no objection to the anticipated vehicle generation of a CSO interception construction site at Barn Elms, 12 HGV movements per day rising to a maximum of 44 HGV movements per day, subject to restrictions on HGV movements in the weekday morning (08.00 to 09.00) peak and on Saturday mornings, to which Thames Water has agreed. Thames Water estimates that for a main tunnel drive site, the HGV generation would rise to 19 vehicles (38 movements) per day, rising to 45 vehicles per day (90 movements). This represents a significant increase over a considerably longer construction period and LBRUT would wish to have the opportunity of undertaking a detailed review of potential impacts if this option was to be pursued.

Demolition and Relocation of Boat House and Sailing Club

24. The amended location for a main drive tunnel site would result in the need to demolish the existing boat house and sailing club facilities and relocate them elsewhere on the eastern boundary of Barn Elms. The locational requirements for such a use would mean that new buildings would be likely to result in the loss of existing trees located between the sports fields and the Thames Path. In addition to their important contribution to the character and appearance of this part of the MOL and Thames Policy Area, the trees fulfil an important role in providing foraging and commuting habitat for bats along this riverside corridor. LBRUT considers that the loss of trees on this boundary would be unacceptable.

Amenity Impact on Residential and Non-residential Neighbours

25. Thames Water predicts that, whilst there are considered to be no issues arising from vibration, a main drive tunnel site, even though located 120 metres north of the currently proposed CSO interception site, significant adverse noise

impacts would arise to neighbouring residential properties, in particular the three houses in Queen Elizabeth Walk, resulting from increased HGV movements on the access road, and to 40 flats in Stockhurst Close, resulting from barge movements and activity at night.

26. Whilst it would appear that fewer residential properties would be directly affected by a main drive tunnel at Barn Elms than at Carnwath Road, the level of impact has not been assessed and it is therefore not possible to judge, on the basis of the information available, whether the impact could be mitigated to an acceptable level.

LONDON BOROUGH OF RICHMOND UPON THAMES

THAMES TIDEWAY TUNNEL PROJECT

**RESPONSE TO OTHER PARTIES' WRITTEN
REPRESENTATIONS**

(UPR LBRUT05)

1.0 INTRODUCTION

- 1.1 This statement should be read in conjunction with this Council's Local Impact Report (Unique Reference No. LBRUT02), the Initial Statement of Common Ground (SoCG), which has been agreed between the Council and TWUL and the Council's Written Representations (Unique Reference No. LBRUT03).
- 1.2 The statement responds to points raised in other parties' Written Representations, and in particular the views of the London Borough of Hammersmith and Fulham (LBHF) regarding the alternative use of Barn Elms as a main drive tunnel site for the Thames Tideway Tunnel project.
- 1.3 LBRUT has set out its views on the impact of the submitted scheme in its LIR and Written Representations. These views relate to a scheme involving the development of a CSO interception scheme. According to information set out by Thames Water in its response to the Examining Authority's First Written Question 14.24, a main drive tunnel proposal would occupy a different site and would be of a different scale of magnitude of development, particularly at the construction stage, that would require a new Environmental Statement and further supporting information to be submitted and assessed.

2.0 SITE SELECTION

- 2.1 In its Written Representations to the Examining Authority, LBHF reviews the Site Selection Assessment undertaken by Thames Water in respect of the decision not to use Barn Elms as a main drive site. The London Borough of Richmond upon Thames (LBRUT) wishes to address the issues raised by LBHF with reference to representations made by Thames Water and other parties.
- 2.2 In paragraph 24.2.2 of its answer to Question 14.24, Thames Water advises that it has carried out design development work in respect of the use of Barn Elms as a main drive site, but, in the time available, has not been able to undertake a full environmental assessment for this development option. Thames Water does, however, suggest that it has been able to draw out the principal issues. The principal issues and likely impacts are set out in Sections 24.4 and 24.6 of Thames Water's response to Question 14.24.
- 2.3 Clearly, on this basis of the information currently available, LBRUT is unable to undertake a full evaluation of the potential impact of the use of Barn Elms as a main drive site, but will identify here the principal concerns that it anticipates will arise.

Impact on Metropolitan Open Land

- 2.4 LBHF suggests that the Phase 1 consultation was misleading because it stated that a 15 hectare site was required for a main drive site for Barn Elms, whereas the Site Suitability Report (in Section 2) states that a 1.8 hectare site would be required for a single drive site and a 2 hectare site for a double drive site.
- 2.5 In preparation of its detailed response to Question 14.24, Thames Water states that it identified information, not available at phase 1 consultation stage, which has led to the location of a main tunnel drive site being moved 120 metres further north than that previously proposed. The reasons for this include the

clarification of the alignment of the high-pressure strategic gas main which runs across Barn Elms and which has to be avoided and a need to avoid tunnelling beneath the Ashlone Wharf Tidal Barrier, details of the construction of which are now known.

- 2.6 Thames Water has confirmed that the site area for a main drive tunnel construction site would be 2.05 hectares, but advises that this does not include the river-based campshed and jetty facilities.
- 2.7 In paragraph 24.4.100 of the response to Question 14.24, Thames Water expresses the view that the use of Barn Elms as a main drive site would involve a significantly different scale of development, both constructional and operational, to that of a CSO interception site. It goes on to say that a CSO has to be intercepted where it is located, which justifies an MOL location, whereas a main drive site is not tied to a CSO location and that, in this case, an alternative site is available, making it harder, in planning policy terms, to justify an MOL location. LBRUT shares this view.
- 2.8 Paragraph 91 of the Mayor of London's LIR states that the proposed development (in respect of the current DCO proposal for a CSO interception site at Barn Elms, which would be a much smaller scale site than would be required for a main drive site) would normally be considered inappropriate in MOL. It goes on to say, however, that the nature of the development is such that is to enable the construction of an important strategic infrastructure project and that the Mayor feels that the impact of the proposals on MOL would be minor and the very special circumstances of delivering the project would justify those minor impacts.
- 2.9 In paragraphs 2.01 and 2.02 of the LBRUT LIR, the Council accepts that the scale and location of the proposed CSO construction site and access road would be acceptable within this MOL context. In paragraph 2.06 of that document, the Council accepts that scale, location and design of the currently proposed operational structures would be acceptable within the MOL context. However, much more information would be required regarding the location, size, design and appearance of a main drive site before a full evaluation of its impact on the character and appearance of MOL can be undertaken. At this stage and on the basis of the information available in Thames Water's response to Question 14.24, LBRUT shares the Mayor of London's concern that the size of the construction site and the associated impacts would be much larger (and may be in a different location) than currently proposed for the CSO site, with a consequential increased impact on the MOL. It is likely, also, that the impact of the operational site would have a greater impact, which would have to be fully assessed.
- 2.10 In addition to the construction works site, a proposal for a main drive site would also involve the provision of foreshore and in-river structures, including campshed, jetty and wharf facilities and overhead conveyors, to allow for removal of spoil and delivery of materials by barge. Additionally, during the main tunnel drive and secondary lining phases, a noise shed would be required in order to mitigate potential noise impacts. The introduction of these structures in a largely open, greenfield context would be extremely harmful to the open character of the MOL, and would have an adverse impact on the character and appearance of this part of the River Thames. The proposals would therefore be contrary to the MOL and River Thames policies of both the London Plan and the LBRUT Local Development Framework.

Loss of Sports Pitches

- 2.11 LBHF accepts that the proposal to put a CSO interception site at Barn Elms would result in the temporary loss of one sports pitch, but it does not accept TW's assertion, at phase 1 consultation, that the use of Barn Elms as a main drive site would result in the temporary loss of 4 to 6 pitches.
- 2.12 Paragraph 24.3.16e of Thames Water's Question 14.24 response reasserts that the relocated main drive site at Barn Elms would result in the loss of 4 to 5 well-used sports pitches and that remaining areas of recreational facilities would require mitigation from construction work impacts. Comparison of the drive tunnel site plan Figure 24.2 of Thames Water's Question 14.24 response with drawing DCO-PP-04X-BAREL-070038, submitted with the Book of Plans (Doc 9.05) on 23 September 2013, supports this view, indicating that two football and two rugby pitches would be lost as a result of the reconfigured main drive site.
- 2.13 LBRUT would object to the loss of these sports facilities, even for a temporary period, which could, in practice, be for a decade or more.

Diversion of Thames Path

- 2.14 LBHF states that no investigation of the cost of maintaining pedestrian and cycle access along the Thames Path or the length of any diversion around the site appears to have been undertaken.
- 2.15 The proposal set out in Thames Water's Question 14.24 response, described in paragraphs 24.4.45 and 24.4.46, suggests that the Thames Path would be maintained. The construction site and the river-based jetty facilities would be separated to achieve this and overhead conveyors would be used to avoid the long-term closure or rerouting of the Thames Path during the construction period.
- 2.16 Whilst LBRUT would not object to the principle of the Thames Path being maintained in this way, the Council does object to the physical consequences of this, namely the increased height and bulk of riverside facilities, which is discussed above in paragraph 2.9 of this statement.

Use of the River Thames Foreshore

- 2.17 The current proposals for a CSO interception site at Barn Elms do not require access to or construction on the foreshore of the River Thames. LBHF is concerned that Barn Elms and the Carnwath Road site have not been assessed equally in terms of the method of loading barges in the river and that the impact of using smaller barges at Barn Elms as opposed to larger ones at Carnwath Road has not been identified.
- 2.18 On the basis of the information available, LBRUT considers that the impact of a main drive site at Barn Elms on the River Thames foreshore will be unacceptable. As described in Thames Water's Question 14.24 response, the construction site would involve the provision of a campshed, jetty and wharf facilities to accommodate up to five barges, with associated dredging to achieve a sufficient depth of water to facilitate barge use.
- 2.19 LBRUT shares Thames Water's concern, set out in paragraph 24.4.105 of its Question 14.24 response, that the in-river works required to facilitate barge use at the site will result in harm to aquatic ecology, resulting in the loss of fish habitat. Further adverse impact on spawning fish, in particular Dace, would

result from floodlights on the in-river structures, particularly during 24-hour working periods.

- 2.20 The use of Barn Elms as a main drive tunnel site would also include a CSO interception, which would give rise, at operational stage, to a significant beneficial effect due to improvements in water quality.
- 2.21 In paragraph 2.30 of its LIR, LBRUT has objected to 24-hour working proposed as part of the current scheme, due to the impact on terrestrial ecology, particularly bats, which are known to use the tree-line on the eastern and southern boundaries of Barn Elms for commuting and foraging. This impact would be exacerbated by the provision of a main tunnel drive work site, with its requirement for a longer 24-hour working period and for floodlights and other lighting to be provided as part of the in-river structures to facilitate barge use.

Disruption of Events on the River

- 2.22 LBHF point out that the Head of the River Race and the University Boat Race, identified by Thames Water as of concern, take place only once a year and it should be possible to avoid barge movements during race times.
- 2.23 In paragraph 24.4.57 of its answer to Question 14.24, Thames Water has identified a further 10 major rowing races, which pass through Barn Elms Reach, and which would require barge activities to be suspended.
- 2.24 Additionally, the Port of London Authority web-site, in its Sailing Events Calendar, identifies a further 17 sailing events between March and October 2013, at or passing through Barn Elms Reach, which may be expected to affect navigation. It is stated that this is not an exhaustive list.
- 2.25 In paragraph 24.4.142, Thames Water identifies 145 river craft movements on a November weekday afternoon and 457 movements on a November Saturday afternoon. It will be noted that this is significantly greater than river traffic passing Carnwath Road at the same times.
- 2.26 The Examining Authority has already received evidence from the Royal Yachting Association that Barn Elms Reach is the busiest stretch of inland waterway in the country.
- 2.27 LBRUT objects to the proposal to locate a main drive site at Barn Elms because of the likelihood of significant impacts on, and conflict with, existing and projected recreational river users. In paragraph 24.4.54 of its response to Question 14.24, Thames Water anticipates an average of 5 barges (10 barge movements) per day during the tunnelling process.
- 2.28 It should be noted that, in paragraph 2.57 of its Written Representations, the Port of London Authority (PLA) states that it believes, inter alia, that the alternative drive strategy proposed by LBHF to be less satisfactory than the current DCO proposals. The PLA does, however, reserve the right to make a further representation once the detailed proposals have been assessed.

3.0 SELECTION OF CARNWATH ROAD AS A MAIN DRIVE SITE

- 3.1 In its Written Representations, LBHF has commented on the reasons identified by Thames Water for selecting Carnwath Road, rather than Barn Elms, as a main drive site. As above, LBRuT wishes to respond to the issues raised,

having regard to representations made by Thames Water and other interests parties.

Greenfield v Brownfield Site

- 3.2 LBHF suggest that the final land take of a main drive operational site at Barn Elms would not be likely to result in any permanent loss of sports pitches and would, at the construction phase, have a only a temporary impact on the provision of open space and sports facilities, which would not be significant when viewed in the context of the overall extent of Metropolitan Open Land and other open land and sports fields in the area generally. In contrast, LBHF is of the view that the selection of Carnwath Road as a main drive site would have an adverse impact on the delivery of a substantial amount of already approved residential development as part of the regeneration of the area. In addition, LBHF considers that inadequate assessment has been undertaken of the impact of the construction phase of the development on parks, open spaces and other recreational uses in the vicinity of the site.
- 3.3 LBRUT does not wish to enter into a debate with LBHF regarding the merits and impacts of using Barn Elms or Carnwath Road as a main drive site. It is for the Examining Authority to exercise that judgement, having regard to the representations made by the relevant authorities.
- 3.4 LBRUT considers, on the basis of the information currently available, that the use of Barn Elms would have an adverse impact on the open character and appearance of MOL and would result in an unacceptable loss of open space and recreational/sports facilities.
- 3.5 In paragraphs 128 and 130 of the Mayor of London's LIR, the issue of the use of Barn Elms is directly addressed. In paragraph 128, attention is drawn to the distinction between Barn Elms, described as a greenfield sports pitches site, and Carnwath Road, which is identified as a brownfield site.

In paragraph 129, the Mayor suggests that Barn Elms, whilst being a short distance away from the River Thames, is accessible to the river with some additional infrastructure. However, the LIR confirms that the navigational characteristics of the Barn Elms site are understood to be less favourable than Carnwath Road, which has historically been used for river-borne freight. Further distinctions are drawn. The Barn Elms site is described as being removed from the public highway network. It notes that a temporary access road is proposed to enable the CSO connection works, but goes on to note that the scale of works that would be involved in using Barn Elms as a main tunnel drive site would be significantly greater than those required of a CSO connection site and that demonstrating the acceptability of such a development on MOL "would be challenging."

Paragraph 130 of the Mayor's LIR states:

"Given the above, the Mayor's view is that Carnwath Road is significantly preferable to Barn Elms as a drive site. This view does not seek to undermine the need for strict controls and mitigation measures for any construction at Carnwath Road."

River Access

- 3.6 As noted above, LBHF considers that an equal assessment of the potential for river use of the site has not been undertaken by Thames Water.

- 3.7 On the basis of the information provided by Thames Water in its response to Question 14.24, LBRUT is satisfied that an appropriate level of assessment has been undertaken in respect of the use of Barn Elms as a main drive site, and that it has sufficient information, at this stage, to identify the main impacts and issues arising from such a proposal. The Council's views on these impacts and issues relating to river access are set out in paragraphs 2.17 to 2.28 above.

Conflict with other river users

- 3.7 Whilst acknowledging that there are more recreational river users at Barn Elms than downstream of Putney Bridge, LBHF state that the impact of barge movements on these users has not been quantified and suggests that a significant proportion of barge movements would be at night when there would be fewer recreational river users.
- 3.8 Paragraphs 2.22 to 2.28 above set out LBRUT's position on the potential conflict of a main drive tunnel site at Barn Elms between barge traffic and associated in-river and foreshore structures and recreational and other river traffic.

Access to Strategic Road Network

- 3.9 LBHF does not accept that the Carnwath Road site has better road access and links to the strategic road network than Barn Elms. It states that the Transport Assessment indicates that the Barn Elms site access, from the Castelnau/Church Road/Rocks Lane junction, will perform better than the access to Carnwath Road, which is from the Wandsworth Bridge Road/Carnwath Road/Townmead Road junction.
- 3.10 LBHF considers that the use of Barn Elms as a main drive site is a better use of existing London-wide strategic road network capacity, with the larger vehicle movement generator located further away from Central London and closer to the locations where the spoil material is to be moved.
- 3.11 Additionally, LBHF takes the view that the environmental impact on residents and businesses of the construction traffic from having a main drive site at Barn Elms would be less harmful than if it were at Carnwath Road because of the more urban character of the area.
- 3.12 In paragraph 58 of his LIR (which incorporated the views of Transport for London (TfL)), the Mayor for London confirms that, given the number of unresolved issues outstanding in respect of the Transport Assessments for each site across the project, TfL is unable to indicate at this stage which sites are acceptable. Given that no modelling has been undertaken in respect of the alternative drive strategy put forward by LBHF, it is fair to say that it is not possible to comment in detail on the assertions put forward by LBHF in support of their proposal.
- 3.13 In its LIR, LBRUT has raised no objection to the anticipated vehicle generation of a CSO interception construction site at Barn Elms, subject to restrictions on HGV movements in the weekday morning (08.00 to 09.00) peak and on Saturday mornings, which Thames Water has agreed. This is based on average vehicle movements of 6 HGVs (12 movements) per day, rising to a maximum of 22 HGVs (44 movements) per day. In paragraph 24.4.37 of its response to Question 14.24, Thames Water estimates that for a main tunnel drive site, the HGV generation would rise to 19 vehicles (38 movements) per day, rising to 45 vehicles per day (90 movements). This represents a significant

increase over a considerably longer construction period and LBRUT would wish to have the opportunity of undertaking a detailed review of potential impacts if this option was to be pursued.

Impact on Natural and Built Environment Policies and Designations

- 3.14 LBHF states that the London Wetland Centre is located more than 500m from the Barn Elms site and no evidence of specific impact on the SSSI has been provided in respect of a main drive site at this location. It states that no assessment of the impact of a main drive site at Carnwath Road has been provided in respect of designated MOL and nature conservation sites within 250m of the proposed construction site.
- 3.15 In paragraphs 117 to 120 of his LIR, the Mayor of London refers to the designation of Hurlingham Wharf as a Safeguarded Wharf and confirms his recommendation, following a review, that the safeguarded status should remain. The decision of the DCLG with regard to the recommendations of the review, including the status of the safeguarding of Hurlingham Wharf, is awaited. The Examining Authority has heard evidence from the Greater London Authority that the safeguarding is likely to be confirmed by the Secretary of State.
- 3.16 LBRUT has set out, in paragraphs above its concerns about the impact of a main tunnel drive site at Barn Elms on the MOL and Thames Policy Area designations of the site.

Programme Risks and Construction Costs

- 3.17 LBHF considers that Thames Water has failed to demonstrate why programme risk would be higher at Barn Elms, whereas construction costs would be lower at Carnwath Road. LBHF considers that programme risk at Barn Elms would be lessened by changes in legislation which allows for temporary uses of open space and permanent use without the provision of exchange land where certain conditions are met. It also considers that build costs, contaminated land remediation costs and mitigation costs and potential relocation costs for residents and businesses are likely to be more significant at Carnwath Road.
- 3.18 In paragraph 24.5.95 of its response to Question 14.24, Thames Water acknowledges that acquisition costs at Carnwath Road are likely to be high and that there will be costs incurred in relocating businesses at Carnwath Road Industrial Estate. Thames Water anticipates that some of this money will be recouped from resale of the land released after the construction of the Carnwath Road site has been completed.
- 3.19 These matters are considered to be a commercial judgement for Thames Water and LBRUT would not wish to comment.
- 3.20 With regard to programme risk, Thames Water remains of the view that the loss of open space at Barn Elms triggers the requirement to locate alternative land for designation as open space. If no such suitable replacement can be found a Special Parliamentary Procedure may be necessary to gain government approval. Paragraphs 24.4.131 to 24.4.136 of Thames Water's response to Question 14.24 deal with this issue. Further representations were made at the Site Specific Hearing on 11 November 2013 by Thames Water and LBHF. LBRUT has no comment to make on this issue.

4.0 OTHER ISSUES AND IMPACTS

- 4.1 The use of Barn Elms as a main drive tunnel site would give rise to other areas of concern in addition to those set out above.

Demolition and Relocation of Boat House and Sailing Club

- 4.2 The amended location for a main drive tunnel site would result in the need to demolish and relocate the existing boat house and sailing club facilities elsewhere on the eastern boundary of Barn Elms. The locational requirements for such a use would mean that new buildings would result in the loss of existing trees located between the sports fields and the Thames Path. In addition to their important contribution to the character and appearance of this part of the MOL and Thames Policy Area, the trees fulfil an important role in providing foraging and commuting habitat for bats along this riverside corridor. LBRUT considers that the loss of trees on this boundary would be unacceptable.

Amenity Impact on Residential and Non-residential Neighbours

- 4.3 Paragraph 24.4.112 of Thames Water's Question 14.24 response predicts that, whilst there are considered to be no issues arising from vibration, a main drive tunnel site, even though located 120 metres north of the currently proposed CSO interception site, significant adverse noise impacts would arise to neighbouring residential properties.
- 4.4 These adverse impacts are considered to be to three houses in Queen Elizabeth Walk, resulting from increased HGV movements on the access road, and to flats in Stockhurst Close, where there are 40 flats, resulting from barge movements and activity at night.
- 4.5 Whilst it would appear that fewer residential properties would be directly affected by a main drive tunnel at Barn Elms than at Carnwath Road, the level of impact has not been assessed and it is therefore not possible to judge, on the basis of the information available, whether the impact could be mitigated to an acceptable level.